

Work Plans

- Above Ground Tank Removal Plan
- Demolition Plan
- Soil Erosion and Sediment Control Plan
- Dust Control Plan
- Spill Prevention and Control Plan
- Quality Control Plan
- Security Plan
- Temporary Site Facilities Plan
- Dewatering Work Plan
- Excavation and Material Handling Plan
- Excavation and Support System Plan
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- Trailer's Floor Plan
- Waste Management, Transportation, and Disposal Plan
- Quality Assurance Project Plan (QAPP)
- Drummed and Hazardous Materials handling Plan
- Workers and Community Protection Plan
- Health and Safety Plan Worker and Community PCB Protection Plan - Cluster 12
- Asbestos Hazard Control Work Plan

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Above Ground Tank Removal Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

ABOVE GROUND TANK REMOVAL PLAN

I. INTRODUCTION

This Above-Ground Tank Removal Plan is submitted in accordance with the project specifications for Storage Tank Removal at the Cornell Dubilier Superfund Site in South Plainfield, New Jersey, and, where applicable, Safe Entry and Cleaning Petroleum Storage Tanks of the American Petroleum Institute Standards 2015, 1604, 2003, 2217A and 2219.

This plan indicates Sevenson's proposed methods for the preparation, emptying, isolation, ventilation, atmospheric testing, cleaning and entry activities in, on, and around atmospheric and low-pressure aboveground storage tanks that have contained flammable, combustible or toxic materials. This plan provides direction for the decommissioning (remove from service) of all aboveground storage tanks. A Underground Storage Tank Removal Plan will be submitted under separate cover.

II. PREPARATION

Prior to commencement of tank or contents removal, all tanks and piping will be inspected and sampled for analysis of suspected asbestos-containing materials. An Asbestos Removal Plan will be submitted for approval in accordance with project Specification Section 13280A. The approved Health and Safety Plan will be implemented by the on-site Health and Safety Officer.

III. SCOPE OF WORK

A. Implementation of Health and Safety

The approved site-specific Health and Safety Plan will be implemented in accordance with the contract specifications. The on-site Health and Safety Officer will conduct real-time air monitoring during the aboveground tank removal process. An explosimeter will identify elevated levels of gas prior to the ventilation and purging of tanks.

Requirements for confined space entry are described in the Health and Safety Plan. The air monitoring results will dictate the levels of personal protection equipment required during the ventilation, dismantlement, and cleaning of the tank.

. ABOVE GROUND TANK REMOVAL PLAN

B. Tank Content Sampling and Analysis

Sevenson will examine the tank to verify that the tank contents have been removed. If the tank contains material, samples will be collected and analysis performed in accordance with the Sampling and Analysis Plan. Sampling will determine disposal options. A technician and laborer will sample the contents of the tank. A thief or cup will extract the oil from tank, manways, and existing valves will be opened for accessibility.

Samples will be collected form outside of the tank. Samples will be placed in pre-cleaned sample containers and sent to Waste Stream Technology Laboratory for analysis.

If the tank is empty, the tank will then be checked for the presence of elevated gas levels. The side walls of the tank will be swiped and analyzed to determine the existence of any potential contamination.

C. Transferring Pump-able Contents

Existing phase water and oil will be pumped from the aboveground storage tanks by a USEPA Certified Waste Hauler. A standard 2" double diaphragm pump, operated with a two-man crew, will be utilized in transferring tank contents. Manways, piping or valves at the bottom of the tanks will allow access to hose connections during pumping operations. Remaining oil or water at the base of each tank can be extracted by the waste hauler.

D. Transferring Non-Pump-able Tank Solids

Tank contents unable to be transferred by conventional pumping methods are considered to be non-pump able solids or sludge. Tank entry may be necessary to remove these solids/sludge. Confined space entry requirements will be in accordance with the approved Health and Safety Plan. Tank top sections will be sheared off to gain access to the tank. A high-pressure water blaster will cut solids from the tank. Laborers will shovel solid contents into the front-end loader bucket. Non-pump able solids will be stockpiled on site for further sampling and analysis.

E. Testing and Venting Tank Vapors

The on-site Health and Safety Officer will conduct air-monitoring procedures as described in the

ABOVE GROUND TANK REMOVAL PLAN

Health and Safety Plan. Prior to dismantlement, each tank will be monitored utilizing an explosimeter to determine presence of any elevated levels of gas. If purging or ventilation is required, the Health and Safety Officer will determine the personal protective equipment necessary to safely begin venting procedures. Inerting of the tank, if required, will be performed utilizing dry ice or other means prior to demolition or excavation of the tank. Mechanical ventilation is the preferred method based on tank design, location, and the product previously stored in the tank. This method requires two openings, preferably at the top of each tank. The mechanical ventilation equipment will consist of a blower driven by an air compressor. The blower unit connected to an existing opening in the tank will displace the air through the second opening. Continuous air monitoring during ventilation procedures by the Health and Safety Officer will determine completeness of air exchange prior to dismantlement.

F. Tank Dismantlement

Upon completion of ventilation procedures, the tanks will be dismantled in place. Sevenson will be the contractor performing the demolition of the above ground storage tanks, specifically the oil tank located in Cluster 12. Sevenson's Spill Prevention and Control Plan will be enforced during demolition of tanks.

An operator will cut the tanks into sections utilizing a Komatsu 300 backhoe equipped with a shear attachment. If Required, openings will be made to allow safe entry for decontamination procedures. Piping and appurtenances will be removed manually and staged at the site on polyethylene. The oil tank at Cluster 12 will be decontaminated in place. Pumps will be utilized to collect any rinsate from the decontamination procedures. Once dismantled, the tank will be sent off-site for reclamation.

G. Decontamination Procedure

If sampling indicates that decontamination is required, the Cluster 12 tank will be decontaminated in place. Rinsate will be collected from inside the tank utilizing pumps.

ABOVE GROUND TANK REMOVAL PLAN

The cleaning procedure utilizes two laborers and a pressure washer (steam jenny). All piping and tanks, interior and exterior, will be thoroughly cleaned with a high-pressure, low volume warm water method. Rinsate from cleaning operations will be collected and pumped to a temporary holding tank pending sampling and analysis, for offsite disposal.

H. Wipe Sampling and Analysis

Wipe samples will be performed by a qualified technician and laborer following tank and piping cleaning procedures. Samples will be analyzed for total PCB concentrates. Refer to the Sampling and Analysis Plan for specifics.

Representative samples will be taken from the bottom and sides of each tank, continuous sections of pipe and each appurtenance. Samples will be placed in a pre-cleaned container and sent to Waste Stream Technology for analysis. Turnaround time for results is approximately 10 working days.

I. Bulk Storage and Off-site Disposal of Tank Contents and Rinse water

Rinsate (decon water) will be collected in a Frac tanks for temporary storage. Compatibility sampling and analysis will be in accordance with Sevenson's Sampling & Analysis Plan. Upon approval for off-site disposal, tank contents will be pumped from temporary storage tanks to the transporter's tanker truck. Temporary storage tanks will be cleaned upon completion of the project, and rinsate will be disposed of off-site. Cluster 12 will utilize a single frac tank for the bulk storage of liquids. An additional frac tank will be provided for the subsequent cluster work.

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Demolition Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

I. DEFINITION

Demolition work will include removal of buildings, structural footings, masonry walls, concrete slabs, driveways, sidewalks, driveway aprons, utility lines, curbs, gutters, stoops, walkways, and fencing, as defined in the plans and specifications for the project.

All work will be performed in accordance with the following plans:

- Site Safety and Health Plan;
- Site Sampling and Analysis Plan;
- Quality Control Plan;
- Soil Erosion and Sediment Control Plan; and
- Spill Prevention and Response Plan.

II. SITE SECURITY/ TRAFFIC CONTROL

Prior to commencement of demolition activities, site security will be established. Chain link fencing will be installed around the entire perimeter of the work site to prevent unauthorized personnel from entering. The perimeter of structures located near high vehicle traffic areas, in which traffic cannot be detoured, will be secured in accordance with proper State and local traffic codes. Proper signage will be placed along the roadway to indicate potential traffic stoppage. During demolition activities, flagmen equipped with orange vests, flags, and two-way radios will be assigned to the area to direct traffic. The flagmen will remain in constant contact with the equipment operators (and each other) throughout demolition activities. Demolition activities will temporarily be suspended to allow traffic to safely pass, and will resume once traffic is clear.

III. PRE-DEMOLITION ACTIVITIES

PERMITS

Sevenson will obtain all necessary permits required to complete demolition activities from the appropriate Federal, State, and local authorities. All work will

be performed in accordance with Federal, State and local regulations. No work will be performed until all permits have been obtained.

PRE-DEMOLITION EVALUATION

Prior to gaining entry to the building(s) proposed for demolition, Sevenson will have a Professional Engineer, licensed in the State of New Jersey, evaluate the building's structural integrity. Once the structure(s) have been deemed safe to enter, Sevenson personnel will conduct an inspection for the presence of asbestos, lead paint, fluorescent light tubes, light ballast that may contain PCB material, thermostats/switches that may contain mercury, and salvageable items. Sevenson anticipates utilizing the Contract drawings prepared by Malcolm Pirnie, Inc. (MPI) to locate the presence above mentioned wastes. Areas requiring remedial work will be clearly delineated by flagging or paint markings.

Prior to demolition, all buildings and properties in the immediate vicinity will be examined. The conditions of the surrounding buildings will be documented with video recordings, photographs, and/or written description.

DISCONNECTION OF UTILITIES

Sevenson will contact all relevant utility service providers (water, electric, gassewer, telephone) to ensure that disconnection of these services has been performed. Demolition work will not begin until all utility service providers have provided written certification of service disconnect and all remaining utilities have been clearly marked. Sevenson will call for utility mark out locations at 1-800-272-1000. Additionally, Sevenson will provide a scan of the construction site with electromagnetic or sonic equipment and mark the ground surface where existing underground utilities have been discovered. A licensed plumber will disconnect any "live" water or sewer lines connected to the structure(s), and a licensed electrician will disconnect power to the structure(s). If during demolition an unmarked utility is encountered, activities will immediately cease. The utility service provider will be contacted to disconnect the service and the client will be

notified. Furnaces, oil storage tanks, and hot water heaters/boilers will be removed, and all associated plumbing will be drained of fluids.

PRODUCT LINES

Sevenson anticipates that all piping remaining from production or former processes will have been drained of any remaining product. Internal inspections of the piping will be conducted to assure the piping is drained. Low spots in the piping will be checked by drilling into the top of the pipe to check for contents. If it is discovered that product remains inside the pipe, Sevenson will immediately notify the client to ascertain proper disposal methods for the remaining product, if not already specified.

IV. EROSION AND SEDIMENT CONTROL

Storm sewers and catch basins located in the vicinity of demolition work will be covered with a woven geotextile and surrounded by hay bales or coir wattles to protect against migrating sediment. Where applicable, silt fence will be installed surrounding the demolition area to prevent the movement of soils during demolition and removal efforts. Sediment control measures will be inspected and repaired daily, as necessary. Erosion control measures will be performed in accordance with Sevenson's Soil Erosion and Sediment Control Plan as approved by the Freehold Conservation District.

V. DUST CONTROL

Fire hydrants will be utilized by Sevenson as a source of potable potable water for use in dust suppression. Sevenson will receive permission from the Borough prior to the use of any hydrants. If a water source cannot be provided, Sevenson will utilize a water truck.. During demolition activities, water will be used to wet the structure thereby limiting the amount of dust released into the environment. Pavements will be swept as necessary to prevent the accumulation of debris and dust. Water usage will be monitored to prevent ponding and runoff. If runoff starts to occur, the amount of water used for dust control will be curtailed. If ponding of water occurs in contaminated areas, the water will be collected by

vacuum truck or pump and placed in the frac tank for sampling and analysis and ultimate disposal.

The equipment proposed for demolition activities include, but is not limited to the following:

- Komatsu PC 300 excavator;
- Komatsu PC 220 excavator;
- Grapple attachment;
- Hoe-ram attachment;
- Off-road dump trucks;
- Front-end loader;
- 40 90 lb pneumatically operated busters;
- Air Compressors; and
- Water Truck.

VI. DEMOLITION SEQUENCE

Immediately preceding demolition, each structure will be inspected to ensure that no personnel are inside.

Asbestos, materials containing PCB's, fluorescent light tubes, light ballast that may contain PCB material, thermostats/switches that may contain mercury, air conditioning equipment, and other items identified (utilizing MPI's Contract drawings) in the pre-demolition evaluation will be removed manually from the structure and disposed of. The Government does not intend to salvage materials from this site. Sevenson will prepare site-specific work plans for asbestos abatement. Proper containment measures of the work areas will be installed prior to -ecommencement of abatement activities.

There is no specific task for lead based paint abatement, however it will be assumed that all painted materials are lead based. Sevenson will make all employees aware of the potential worker exposure issues during demolition procedures. Water will be misted onto the surface to eliminate the possibility of

dust or lead emissions. Sevenson will not sand, grind, or perform any other operation that may cause lead to become airborne.

Fluorescent light tubes will be hand collected and temporarily stored for disposal. Ballast that may contain PCB material will be placed into 5-gallon or 55-gallon sealable containers. If necessary, absorbent material (i.e. Speedy-DryTM) will be added to the container to alleviate void space and provide protection against possible leakage during transport. The containers may be temporarily stored on site until disposed of. Thermostats/switches containing mercury will be handled in a similar manner as light ballasts.

Ozone Depleting Substances (ODS) which are Class I or Class II category will be placed in cylinders meeting ARI Guideline K, filled to no more than 80 percent capacity. Products, equipment and appliances containing ODS in a sealed, self contained system (e.g. residential refrigerator, window air conditioner) will be disposed in accordance with 40 CFR 82.

Materials containing PCB's will be the initial materials demolished removed once asbestos, fluorescent light tubes, light ballast that may contain PCB material, thermostats/switches that may contain mercury, air conditioning equipment, have been removed from the structure. The areas containing PCB materials will be delineated by use of paint of flagging. The roof of the structure will be removed, by grapple, leaving the contaminated wall undisturbed so that it does not get comingled with non-hazardous debris. Sevenson will not brace walls once the roof has been removed. Care will be utilized while segregating these materials, hazardous and non-hazardous. Like wall materials (hazardous/non-hazardous) will be placed on the slab of the building for loading and transportation and disposal. Note that sampling and analysis of the walls/slabs will be performed prior to demolition. It may be necessary to install storage areas of the materials so that enough quantity of material can be gathered for full truckloads. Stockpiles will consist of a 40 mil liner placed on the asphalt, bermed about the perimeter utilizing coir wattles The liner will be placed over the wattles. Stockpiled material

will be covered daily to prevent precipitation coming into contact with the waste.

Refer to Sevenson's Waste Management Plan for specifics.

Each building will be demolished from the roof down using a backhoe with a grapple attachment. The materials will be sorted prior to their being loaded and shipped for disposal/ recycling. Foundations will be demolished and removed in their entirety. Typically, a Komatsu PC 300 backhoe with a hoe-ram attachment is utilized to demolish foundations. A backhoe is then used to load the sized material for off-site transportation and disposal. Sevenson will make every effort to limit damage to existing slabs or pavement to remain in place during demolition activities.

Sidewalks, driveways, patios, and roads are typically removed using a backhoe. Pavement sections that are to remain will be saw-cut using a floor saw, pavement saw, or cut-off saw such that a defined, clean, straight cut is achieved. Designated sections will be removed and sized using a backhoe.

Sevenson will coordinate disposal of material, including required waste characterization and manifesting. Sevenson will size, stockpile, and load-out material for disposal. Steel material that can be sent off site for recycling will be sized and placed into containers supplied by the recycling facility. Steel tanks will be dismantled utilizing shear attachments on backhoes. Initially, the tanks will be examined for the presence of contents (oil, water, etc.). Once the contents have been verified as being removed, the tank will be cut up into sizes acceptable to the disposal/recycling facility. Sevenson anticipates recycling all non-porous materials, including steel. Prior to shipment off-site the materials to be recycled will be checked for the presence of contamination and if found will be decontaminated utilizing pressure washing techniques.

Upon completion of load-out activities, site restoration will be completed as outlined in the Specifications. In the case where a slab/pavement is to remain, the slab/pavement will be broom swept and inspected by Sevenson with note made regarding damage caused by demolition activities (if any).

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Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

I. PROJECT SUMMARY

The Cornell Dubilier Electronics Superfund Site (Site), Operable Unit 02 (OU-2), is located at 333 Hamilton Boulevard in the Borough of South Plainfield, Middlesex County, New Jersey. The site is listed on the National Priorities List due to contamination found in the soil and building materials. Work under OU-2 includes demolition of structures, transportation of all wastes and offsite disposal of all wastes including demolition debris and soil resulting from demolition; restoration with backfill and pavement; and other activities necessary for the complete and proper remediation of the site.

II. PLAN OBJECTIVE

The objective of this plan is to state the soil erosion and sediment control measures Sevenson will implement on the Cornell Dubilier Superfund site to prevent and minimize erosion and sedimentation. Soil, water, and other natural resources will be protected from degradation and depletion that often result from land-disturbing development activities through the use of measures outlined in this Soil Erosion and Sediment Control Plan.

The soil erosion and sediment control measures described herein are designed based on the following principles:

- Minimize exposure of bare soil;
- Preserve existing vegetative cover wherever possible;
- Prevent soil from leaving the site through the use of silt fences, hay bales, and/or stone (as necessary);
- Stabilize disturbed areas soon after final grading;
- Keep runoff velocities low;
- Divert run-on water away from disturbed areas; and

Reduce sedimentation by utilizing erosion control practices on site.

This plan is based on New Jersey State Code NJAC 7:14 and the requirements of the USACE's contract drawings and specifications. A copy of the approved Soil Erosion and Sediment Control Plan, including related drawings and inspection logs, will be kept on site at all times for inspection by the USACE. Revisions to the approved plan will be submitted to the Freehold Conservation District for approval with acceptance criteria submitted to the USACE.

III. PLAN IMPLEMENTATION

All erosion and sediment controls will be put into effect and functional prior to commencement of any earthwork activities. Once in place, Sevenson's Quality Control Manager, or his representative, will be responsible for the inspection of all control measures daily and after each rain event. Any items found noncompliant with this plan will either be repaired or replaced immediately.

The Quality Control Manager has the authority to stop work until these repairs are completed. He will also maintain a log of his inspections and a list of deficiencies found, and the corrective action(s) taken.

IV. PLAN COMPONENTS

Siltation and erosion control practices will be consistent with currently acceptable practices, including the placement of silt fencing and hay bales to mitigate sedimentation transport; the use of berms and trenches to re-direct surface water run-off/run-on to prevent contamination of adjacent properties; and the use of absorbent booms, where applicable, to prevent the flow of contaminated liquids from entering navigable waterways and/or storm sewer pathways.

 Surface drainage from cuts and fills within the limits of the work will be graded to control surface water flow (i.e., mitigate run-off and run-on) and mitigate soil erosion.

- Sedimentation barriers will be installed using siltation fencing and/or hay bales around the perimeter of the work area (i.e., excavation areas). All sedimentation barriers will be inspected (inspections will be documented on the attached Environmental/Spill/Soil Erosion Protection Review Form) and maintained until interim site restoration is completed.
- Previously established grades will be maintained in a true and even condition.
- Areas of bare soil exposed by construction activities will be restricted to a minimum.
- Any piece of equipment coming into contact with contaminated soils will be decontaminated with a pressure washer at the equipment decontamination station.
 All equipment will be inspected prior to leaving the decontamination area and prior to authorization to leave the site.
- Sevenson or its subcontractors will immediately clean up any uncontaminated mud or soil *tracked* on the site prior to the vehicle reaching roadways.
- All soil erosion and sediment control measures (silt fence, hay bales, trenches, berms, etc.) will be installed prior to any major soil disturbances, or in their proper sequence, and maintained until permanent protection is established.
- All work will be performed in accordance with the State Standards for Soil Erosion and Sediment Control in New Jersey.
- Submittal of the SESCP to the Freehold Conservation District will serve as notification of excavation/land disturbance activity.
- Any changes to the approved SESCP will require the submission of revised SESCPs to USACE and the Freehold Conservation District. The revised plans must meet all current soil erosion and sediment control standards.

SITE SEDIMENT CONTROLS

The following control devices will be constructed as indicated below and installed in the order shown:

- Stabilized Construction Entrances: The site presently has several entry points for vehicular traffic. Sevenson will limit use to only one access point as means of access to and from the site. The entrance is paved roadways leading into the site from Hamilton Boulevard. Sevenson does not anticipate that the use of the stabilized construction entrances will be required as the site is currently paved. In the unlikely event that a stabilized entrance is required, Sevenson will construct stabilized construction entrances on the site as required prior to entering existing roadways. The stabilized entrances will be constructed by placing filter fabric over the existing roadway and covered by a minimum of six inches of clean stone. The stabilized entrances will be at least 20 feet long and the full width of the roadway. Since the purpose of the stabilized entryways is to provide an area to remove mud and dirt from the tires of vehicles leaving the site, the entranceway stone will be cleaned or replaced when the stone becomes clogged with mud. Any mud deposited on public roadways will be removed immediately.
- Silt Fence: Sevenson will install wire-reinforced silt fencing along the down slope sides of the work (excavation) areas. The lower edge of the silt fencing will buried a minimum of six inches and will be placed with the wire reinforcing on the upslope side. Installation will be as shown on drawing G-54. The silt fencing will be monitored daily for silt accumulation and when the silt build up causes the silt fence to either bulge, or accumulates half way up the silt fence, the silt will removed, placed on the site and re-graded.
- Sedimentation barriers: Pre-manufactured siltation fences will be used as sedimentation barriers and will be installed in areas where the potential of soil runoff and erosion may occur. Siltation fences will be installed on natural ground, at the

bottom of fill slopes, and in ditches and other areas where siltation is a problem and will be maintained until grass is established. These fences will be embedded to prevent water from running under them. Fences will be monitored daily and maintained in satisfactory condition for the duration of the project.

- Inlet Protection: Sevenson will construct sediment barriers at curb inlets and drop inlets as appropriate. In the event that excavation work is conducted near the road that could impact any off-site drains, the off-site drains will have protection measures installed, including installation of siltation curtains to mitigate sediment flow into the drain system. In addition, Sevenson will maintain absorbent booms on-site for use in preventing contaminated materials from entering the drainage system in the event of a spill.
- Stockpiles: Silt fencing will be placed to surround all stockpiles of soil materials. Any stockpiles anticipated to be undisturbed for longer than 21 days will be temporarily seeded with annual rye grass. Sevenson will prevent the migration of surface water to the disturbed areas through use of berms, temporary swales, etc.
- Additional Measures: Immediately upon recognizing that unforeseen circumstances pose the potential for accelerated erosion or sedimentation, Sevenson will use appropriate best management practices to eliminate the potential for accelerated erosion and sedimentation. Sevenson will supplement the above control devices with, but not limited to, hay bales, rock dams, erosion control matting, riprap lining and/or sedimentation basins. Should the need arise to pump sediment laden water, Sevenson will use best management practices to discharge the water through sediment control devices, such as hay bales, silt fence, etc. prior to discharging the water over non-disturbed vegetative areas. Water from excavations will be collected, stored, sampled and analyzed to determine the best disposal options.
- Final Grading and Restoration: Sevenson does not anticipate that any excavated surfaces will require the use of topsoil. Final grading will consist of the placement

and compaction of dense aggregate material (DGA) followed by the placement of bituminous pavement Upon completion of the project objectives and backfilling the site to sub-grade, bituminous asphalt pavement, as specified, will spread over the disturbed areas and graded to the final design contours.

• Removal: Removal of the erosion and sediment controls will be accomplished as the items are no longer needed. Inlet protection structures and silt fencing around stockpiles will be removed once stockpiles are depleted. The curb inlets to be left in place will have the inlet protection remain intact until pavement has been restored. Remaining soil erosion controls will be removed upon the USACE's approval. The last sedimentation controls to be removed are the curb inlet protection, the perimeter silt fencing, and the stabilized construction entrances. Any disturbances due to the removal of the silt fence ,or other control item, will be repaired, seeded, or stabilized immediately.

V. PERMIT EQUIVALENCY REQUIREMENTS

All work will be performed in accordance with the State Standards for Soil Erosion and Sediment Control in New Jersey.

VI. FINAL RESTORATION, MAINTENANCE, AND ACCEPTANCE

Following the completion of all remedial activities the site will be restored. Site restoration will include the repair of any site areas damaged or disturbed during the completion of remedial activities, as well as establishing vegetative cover at all disturbed site areas, and cleaning all work areas to remove all materials and waste.

All disturbed areas, once fine graded to final contours, will be covered with pavement in accordance with Contract Specification Section 02742.

FINAL INSPECTION

After Sevenson has restored all areas designated by the USACE, Sevenson will request that a Final Inspection be held by the USACE to determine that deficiencies noted in the preliminary inspection have been corrected.

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F.

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

I. Introduction

This Dust Control Plan (DCP) has been prepared by Sevenson Environmental Services, Inc. (Sevenson) to address the control of fugitive and airborne dust emissions from the Cornell Dubilier Superfund Site (the Site) located in South Plainfield, New Jersey. This Plan complies with the State of New Jersey rules for controlling fugitive dust emissions as specified in Specification Section 01351. The primary objective of this plan is to formulate a strategy for controlling, to the greatest extent practicable, fugitive or airborne dust emissions at the Site. This will be accomplished by identifying specific sources and activities that have the highest potential to produce or generate fugitive or airborne dust emissions. This plan describes the engineering controls necessary to minimize and control dust emissions from those sources and activities. This plan is prepared to address the control of fugitive dust emissions at the Site that are a result of current remediation activities. As necessary, the scope of this plan will be revised to reflect changes in Sevenson's dust control strategy as site conditions or activities may change in the future.

The Cornell Dubilier Electronics Superfund Site (Site), Operable Unit 02 (OU-2), is located at 333 Hamilton Boulevard in the Borough of South Plainfield, Middlesex County, New Jersey. The site is listed on the National Priorities List due to contamination found in the soil and building materials. Work under OU-2 includes demolition of structures, transportation of all wastes and offsite disposal of all wastes including demolition debris and soil resulting from demolition; restoration with backfill and pavement; and other activities necessary for the complete and proper remediation of the site.

As a precautionary and control measure for this project, this Dust Control Plan will be used as a standard operating procedure. This plan will be used:

- To eliminate origins of dust from the site;
- To identify potential dust migration pathways;

- To monitor for dust produced by site activities; and
- To implement corrective actions as the need arises.

This plan is not intended to address all situations as they may occur, however, the plan has attempted to include all foreseeable situations and planned work areas/activity tasks. In addition, the plan provides an approach to those situations that cannot be anticipated at the time of its preparation. The plan is prepared and submitted with the understanding that it can be modified to accommodate actual site conditions as they arise. This plan will be implemented in conjunction with the project Health and Safety Plan.

II. POTENTIAL FUGITIVE DUST SOURCES

The materials of concern, with respect to fugitive dust emissions at the Site, are PCB's, lead, and asbestos. Sevenson has identified the following project work areas/tasks as potential sources of fugitive dust emissions. They are as follows:

MOBILIZATION

During site mobilization, the following tasks will be performed, which have potential for producing dust:

- Grading and placing stone to prepare the support area;
- Grading and placing of stone to upgrade stabilized construction entrances; and
- Delivery of equipment and materials.

SITE PREPARATION

The following site preparation activities may generate dust:

- Test pit excavations to locate utilities;
- Utility installations; and

• Installation of erosion and sediment controls.

UTILITY DISCONNECTS/REMOVALS

- Utility disconnects and removals (gas mains, water mains, sanitary and storm drains) may require the following excavations/activities with the potential to produce dust;
- Sidewalk excavation and removal;
- Pavement saw cutting and excavation;
- Utility trench excavation and backfill; and
- Sidewalk and street grading.

BUILDING DEMOLITION

The following activities are likely to generate dust:

- Demolition of buildings and consolidation of waste;
- Excavation of building foundations;
- Crushing concrete and brick material;
- Transport of demolition debris;
- Backfill of pits and trenches; and
- Excavation, loading, and transportation of soil/debris.

CONTAMINATED SOIL EXCAVATION

Excavation activities are likely to generate dust from the following:

- Asphalt saw cutting and removal;
- Soil excavation and loading; and
- Soil transportation.

WORK AREA RESTORATION AND DEMOBILIZATION

After remedial activities are completed, the following operations will take place:

- Backfill to existing lines and grades;
- Pavement restoration; and
- Removal of equipment and temporary facilities.

III. DUST CONTROL AND MITIGATION PROCEDURES

The following methods will be used to prevent conditions conducive to dust generation and suppress dust should it occur. Dust controls will be implemented immediately whenever dust can be observed on the project as a direct result of demolition or excavation activities, as directed by the USACE and/or when personnel area or perimeter monitoring instrumentation dictates.

The methods below are presented in accordance with project functions or specific work areas.

WORKER TRAINING AND PRACTICES

- Educate, train and reinforce workers at daily safety meetings of the necessity to perform their tasks in a manner that does not generate dust;
- Stress the importance and reinforce the need to keep assigned work areas clean,
 neat, and dust-source free as a standard operational procedure during all work
 activities on an ongoing basis;
- · Maintain dust suppression in assigned work areas; and
- Ensure that workers notify supervisors of dusty conditions whenever they are visually observed and request dust suppression support if needed.

MOBILIZATION

- Insure trucks delivering materials (stone, gravel, etc.) are covered/tarped;
- Maintain access roads and regrade as required;
- Establish speed limits suitable to access roads to minimize fugitive dust;

Routinely apply water to cover high traffic areas (haul roads and site access roads)
with water spray from water truck or local hoses. This procedure will help prevent
soil from accumulating on surfaces or from drying. Broom sweep asphalt roads after
application of water.

SITE PREPARATION

- Routinely apply water to the excavation area to dampen excavated materials. Care
 will be utilized to not saturate the material; and
- Routinely apply water to access roads, as necessary, with a water spray. Broom sweep asphalt road areas where water has been applied.

UTILITY DISCONNECTS AND REMOVALS

- Routinely apply water to the excavation to dampen excavated materials;
- Backfill trenches with clean fill material.

PERSONNEL CONTAMINANT REDUCTION ZONE (CRZ)

- Utilize proper decontamination procedures;
- Properly remove and containerize all PPE;
- Remove accumulated solids and debris within the CRZ;
- Maintain boot wash basins; and
- Perform daily housekeeping of the CRZ.

EXCAVATION / BUILDING DEMOLITION

- Apply water mist/fog during building demolition to minimize dust emissions;
- Routinely apply water to access roads;
- Establish speed limits to access roads to minimize fugitive dust;
- Routinely apply water to cover high traffic areas with water spray from water truck or local hoses to prevent clean soils from accumulating and drying;
- Place polyethylene on the ground surface where trucks are loaded;

- Material loaded into trucks should not be dropped from heights above the truck body;
- Broom sweep truck tires used to haul material off site prior to leaving the site.
- Immediately clean excavated material spilled on the ground surface and sweep the road as required;
- Routinely remove any material that accumulates around equipment and work areas;
- Cover stockpiled materials with polyethylene at the end of each workday as storage areas become full or during periods of high winds;
- Cover (tarp) loaded trucks; and

WORK AREA RESTORATION AND DEMOBILIZATION

- Routinely apply water to the utility excavation to dampen excavated materials;
- Routinely apply water to access roads with a water spray. Broom sweep asphalt road areas where water has been applied;
- Establish speed limits to minimize fugitive dust;
- Ensure delivery trucks (delivering backfill materials, etc.) are covered; and
- Routinely apply water to the backfill materials for moisture control.

HEAVY EQUIPMENT DECONTAMINATION

- Remove gross contamination with brooms, shovels, scrapers and brushes;
- Wash with spray washers, if needed;
- Rinse with power-washer or steam-jenny if brooming techniques fail; and
- Transfer accumulated solids to stockpile/disposal area.

IV. BEST MANAGEMENT PRACTICES

The following Best Management Practices (BMPs) will also be followed to help minimize and control dust emissions at the Site to the greatest extent possible:

Roads—All onsite traffic will be restricted to specific designated roads. Off-road travel will only be authorized on a case-by-case basis. Traffic speed will also be restricted to an appropriate level on all designated roads. All designated roads will be considered as high potential dust source

areas, and as such, will be a priority for dust controls utilizing magnesium/calcium chloride, watering, or gravel.

Hours of Operation—This Plan will be in effect during all hours of operation at the Site. During non-business hours, there will be no activities generating dust; therefore, dust control actions will restricted to hours of operation only. However, as a best management practice, if high winds are evident at the close of a business day (or immediately prior to a weekend, holiday, etc.), site personnel should evaluate vulnerable areas and implement controls as appropriate to minimize off-hours emissions.

Use of Chemical Suppressants—Use of various chemical dust suppressants (e.g., surfactants, salt-based soil conditioners, etc.) shall be done in accordance with the recommended end-uses for those products. Site personnel shall not exceed the manufacturer recommended application rates. Material Safety Data Sheets (MSDSs) for all dust suppressant materials used at the Site shall be reviewed and approved by USACE. Prior to application, site personnel shall determine and evaluate if the use of the dust suppressant could interfere with other site monitoring activities, or cause other harm to the environment (e.g., runoff into critical habitat for threatened or endangered fish). The MSDSs for dust suppressants will be kept on-site

V. Monitoring and Corrective Action

Sevenson will implement all dust-monitoring/correction programs. Daily site safety meetings will reinforce the need for all workers to be cognizant and responsive to conditions or activities that generate visible dust. The area foreman and supervisors will be notified immediately if dust is observed or if conditions exist where dust could be a problem. The initial step of the program is to visually observe the infraction.

The sequential corrective action task list for the elimination of fugitive dust at this site is presented below:

- Reduce the pace of, or cease, dust producing activity until the problem is corrected.
- 2. Notify the area supervisor of dust conditions and implement dust suppression procedures.

- 3. Remove accumulated dirt and soil from problematic areas, and/or cover, enclose, or isolate dust-generating areas/surfaces to shield them from wind, sunlight or heat sources.
- 4. Increase frequency, volume, and/or coverage of water misting, sprays, and foggers to prevent soil and dirt from drying.
- 5. Provide additional dust suppression systems and operating personnel during the task duration.
- 6. Modify operating procedures and methods to eliminate problematic conditions.
- 7. Increase level of worker awareness and instruct them on implementation of any new or modified operating procedures.
- 8. Report and document all procedural modifications and results.
- Perform routine audits of dust suppression methods and work areas for dust sources.

Sevenson's Project Manager and Site Safety Officer have the responsibility and authority to implement this Dust Control Plan.

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Spill Prevention and Control Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

I. PURPOSE

This Spill Prevention and Control (SPC) Plan has been prepared by Sevenson Environmental Services, Inc. to satisfy USACE's Specification Section 01351 contract requirements for the Cornell Dubilier Superfund Site. This is a site-specific SPC plan that establishes Sevenson's policy to prevent, respond to, and report spills or releases to the environment. This plan, as presented herein, will provide contingency measures for potential spills of bulked liquids, contaminated soils, and other solids handled on site. Sevenson's goal is to generate, transport, store, handle, and dispose of oil and hazardous substances in a manner that protects the environment and public health. The SPC plan will be updated as project work progresses or site activities change. An updated copy of this SPC plan will be maintained and implemented at the project site.

Sevenson personnel will respond to all on-site spill emergencies. It will be the waste haulers responsibility to respond to all off-site emergencies.

II. SITE INFORMATION

The project site is located at 333 Hamilton Boulevard, South Plainfield, New Jersey. The project consists of demolition of all structures, transportation and disposal of all waste, and restoration with backfill and pavement. The project site and adjacent properties are commercial and residential. The majority of the project site surface is paved with asphalt with areas of stone. All aboveground and underground utilities located within the project site boundaries will be identified prior to beginning work. Sevenson will conduct an environmental investigation during the mobilization phase of the project. Investigation work will consist of documenting existing site conditions and noting any potential sources that may require a spill response (i.e., wet wells, pits, etc.).

TOPOGRAPHY AND SURFACE WATER FLOW

The project site is generally sloped toward the east, southeast towards the Lehigh Valley Railroad and Factory Street. Surface water runoff from the site flows in this general direction

POTENTIAL SPILL SOURCES

Potential spill sources at the site include materials and equipment brought on-site, pre-existing site contamination, and potential unknown site conditions.

Equipment and Materials Brought On-site

- Equipment staging and maintenance areas (fuel, lubricating oil, and hydraulic oil from drill rigs, backhoes, bulldozers, piling drivers, water trucks, pickup trucks, support truck equipment, lighting units, pumps, and generators);
- Fuel staging areas (bulk storage of gasoline and diesel);
- Hazardous material staging (containers of lubricants, fuels, and hydraulic oil); and
- Hazardous waste storage (drums of used oil filter, material used to clean and maintain equipment).

Pre-existing Site Conditions

Hazardous materials documented to be present at the site include the following:

- Large amounts of asbestos present in existing buildings;
- Metals;
- PCB containing lighting ballasts;
- Transformers and capacitors;
- Fuel oil;

- Fuel oil and;
- PCB's in soil

Unknown Conditions that may be encountered

- Abandoned USTs and underground pipelines may exist at the site.
- Contaminated soil and groundwater (not identified in the project plans and specifications) are possible based on past land use.

CONTRACTOR PERSONNEL

The Sevenson Environmental Services, Inc. designated person responsible for managing, implementing, and maintaining this SPC plan is Wayne Kostuk. His designated alternative is William Zambrana. Project phone numbers are as follows:

- Sevenson Environmental Services, Inc. corporate office (716) 284-0431
- Project site office: 908-769-5301
- Wayne Kostuk, cellular 716-628-1962
- William Zambrana, cellular 973-518-0257

III. GENERAL

All response actions will comply with the site Safety and Health Plan. Temporary fuel (oil) storage tanks will be placed in a lined containment area of sufficient size and strength to contain the contents of the tank in the event of leakage.

Emergency Contacts in the event of a spill:

• USEPA Spill Response (800) 424-8802

NJDEP Spill Response (609) 292-7172

Middle Sex County Hazmat (732) 727-6626

NJ One Call

(800) 272-1000

IV. PROJECT SITE DESCRIPTION

ITEMS BROUGHT ON SITE

Equipment staging and maintenance, fuel staging, hazardous material staging, and waste storage areas are located within a secure, fenced area of the site. The general work areas are paved while the equipment staging consists of a stone surface. Any spills within the fenced area will be collected and placed within a sealed container(s). Types of containment include:

- Fuel oil;
- Spent fuel oil;
- Solvents;
- Grease and;
- Gasoline

V. MATERIAL HANDLING

BULKED LIQUIDS AND SOLIDS

Sevenson will ensure that all vehicles provided for the remedial work are in a good state of repair. The equipment will be operated in a safe manner to prevent spills during the handling of all bulked liquids and solids. Equipment (i.e., tankers, frac tanks, etc.) storing bulked liquids must be certified for that purpose and must be inspected to ensure that all valves and other access ports are secured to prevent leaks. All hoses, pumps, valves, and connections will also be inspected to ensure the unit is free of leaks. Haulage units (trucks, intermodals, etc.) used for bulked-solid-handling will be inspected to ensure that their tailgates are secured and the loads are covered (tarped) to avoid spillage or spread of the solids or excavated material.

DRUMMED WASTE

The handling and transport of drummed waste will be, at all times, conducted in a controlled and safe manner which will minimize damage to drums, repacks, or overpacks. If during transport or handling, leakage or spillage of waste occurs, the drums will immediately be placed within an overpack unit (overpack units will be provided on site). The spill will be cleaned up immediately and the incident will be logged.

EQUIPMENT

Sevenson will have the following equipment on-site to be used for any unexpected spills:

- Sand, clean fill, or other non-combustible absorbent;
- Several empty overpack drums, a dump truck or a 20-cubic yard (cy) roll-off container;
- Shovels:
- Front end loader;
- High volume water pump;
- Water transfer hoses; and
- Wash water for decontaminating tools and equipment.

Hand tools used for spill response will generally be discarded with the waste material unless it is determined appropriate to decontaminate the tools. All contaminated materials, including solvents, cloth, soil and wood that cannot be decontaminated will be properly containerized, labeled, and disposed of as soon as possible.

VI. SPILL RESPONSE

Sevenson personnel will respond to all on-site spill emergencies. It will be the waste haulers responsibility to respond to all off-site emergencies.

If a spill occurs, Sevenson will notify the USACE immediately and take immediate measures to control and contain the spill within site boundaries.

Measures to be implemented are as follows:

ASSESS HAZARD

Sevenson will stop operations and Mr. Kim W. Lickfield will determine if the spill is *incidental*, which is defined as (1) spilled material that is known and definable and (2) Sevenson has the resources (trained personnel, equipment, and supplies) onsite to safely and effectively respond to the spill. If one or more of the criteria are not met, the spill is not *incidental* and direction will be given for evacuation of the area and the fire department (911) and emergency response contractor/team will be notified.

If the spill is incidental, Sevenson will assess the quantity of substance spilled and the extent of the affected area, and implement the following:

- Isolate hazardous areas and keep unnecessary people away;
- Prevent people from touching spilled materials;
- Stay upwind, keep out of low areas;
- Keep combustibles away from the spilled materials;
- Secure the area and obtain the appropriate spill response equipment and PPE;
- Use water sprays or foam suppressant to reduce vapors, as needed;
- Contain the spill area;
- Seal or stop the source of the spill by closing valves, providing containment,
 or deactivating pumps, as applicable; and

• Take samples for analysis to determine that the clean-up is adequate.

MITIGATING, REMOVING, AND DISPOSING OF SPILLED MATERIAL

Only OSHA-trained personnel will perform spill cleanup activities. The spill response contractor/team will be responsible for cleanup activities as a result of spills or leaks when Sevenson does not have the training, equipment, or materials to cleanup this particular spill.

SPILLS ONTO THE GROUND (SOIL):

- Clean up the spill immediately.
- Absorb liquid spills with sand, clean fill, or non-combustible absorbent materials.
- Employ control measures to prevent the diversion of extraneous water onto adjacent properties. This water will be diverted to existing storm water collection systems.
- Collect spilled material and place into drums labeled to identify contents.
- Collect absorbent and other material used to clean up the spill, label the container, and properly dispose of waste at an approved disposal facility.
- Notify the NJDEP.
- Decontaminate the affected area, equipment, and surfaces that have contacted the spilled material.
- Restore habitat, if necessary.

SPILLS INTO WATERWAYS:

- Notify the National Response Center and the State of New Jersey Emergency Management Division.
- Notify a spill response contractor, if necessary.

- Stop the source of the spill immediately.
- Shut down all equipment and ignition sources in the area.
- Deploy boom and absorbent to contain the spill.
- Clean up absorbent and waste materials and dispose of at an approved waste disposal facility.
- Decontaminate the affected area, equipment and surfaces that have contacted the spilled material.

CONTAMINATED SOIL SPILLS

In the event that contaminated soil is spilled on-site, Sevenson will implement the following:

- The spill area will be secured.
- The contaminated material will be cleaned up and placed in a container/box.
- The surface area where the spill occurred will be surveyed for contamination.
- Once the area is deemed decontaminated, the area will be restored to its original condition.

DECONTAMINATION PROCEDURES:

Decontamination procedures may be required after cleanup to eliminate traces of the substance spilled or reduce it to an acceptable level as determined by the USACE. Complete cleanup may require removal of contaminated soils. Personnel decontamination will include showers and cleaning or disposing of protective clothing and equipment. All contaminated materials including solvents, cloth, soil, and wood that cannot be decontaminated will be removed and disposed of properly.

REPORT/NOTIFICATION

Sevenson will submit a spill report/notification to the USACE, which will include the following:

- Type of Release;
- Source of Release;
- Contents of Release;
- Quantity of Release;
- Time of Release;
- Contact list, in order;
- Injury Report;
- List of personnel involved; and
- Final disposal location.

VII. STORMWATER RUN-OFF RELEASES

Requirements for control of sediment in stormwater run-off will be performed in accordance with Specification Section 01356A and Sevenson's Soil Erosion and Sediment Control Plan. These requirements will include, but are not limited to, the following:

- Installation of a decontamination pad in accordance with the contract drawings, including collection of contaminated water;
- Curtailing work to reduce the exposed surface in heavy rains; and,
- Controlling sediment that may be entrained by rainwater running off the site.

TR	MANUFACTURE	R'S CERTIFICATES		LES, OR	DA		nber 5, 2006	TRAN	6.1	
Section 1	REQUE	ST FOR APPROVAL	OF THE FOLLOWING ITE	MS (This section	n will be i	nitiated by	the contractor)			
P 3:	SACE atrick Nejand 33 Hamilton Blvd. outh Plainfield, NJ 07080	FROM: Sevenson Enviror 2749 Lockport Rd Niagara Falls, NY		MAILENAL MPLES, OR December 5, 2006 TRANSMIL END. TRANSMIL END. TRANSMIL END. TRANSMIL END.	f _6 or					
SPECIFIC	CATION SEC. NO. (Cover only one sec	tion with each transmittal)	PROJECT TITLE AND L	OCATION:						
	01330		Cornell-Dubilier Electro	onics Super	fund Si	te OU2		South	Plainfield, I	N)
ITEM NO.	DESCRIPTION OF ITEMS SUBMITTED (Type, size, model number, etc.)		MFG. OR CONTR. CAT., CURVE DRAWING OR		CON			Contracto	(See	FOR CE USE CODE
			BROCHURE NO. (See instruction No. 8)					1036	l USE	
a.	b.		С.	d.	•	<u>). </u>	f.	g.	h.	i.
1	Quality Control Plan - Revision 1			6	1	.2		A		
1 copy for	N. Kolb, USACE, Project Field Office E. Urbanik, USACE N. Resident (P. Mannino, USEPA Project Mana	Office, NY District, 214 St	tate Highway 18 N, E. Brunswick, I eld Office, 333 Hamilton Blvd, Sou			are correct Specificati Willian	and in strict conform ons except as otherv on Zambrana, SES	nance with the rise stated.	Contract Drawing	
Section II			APPROVAL ACTION							
INCLOSU	RES RETURNED (List by Item No	.) NAME, TITLE A	ND SIGNATURE OF APPROV	VING AUTHO	RITY			DATE		

Quality Control Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

I. INTRODUCTION

Sevenson's Contractor Quality Control Plan (QCP) will be implemented to ensure that remedial and construction procedures are performed in compliance with the plans and specifications under this contract. The quality control measures as presented herein will include construction procedures; staffing; types of material and equipment to be used; and methods of performing, documenting, and enforcing quality control operations of both the prime contractor and subcontractors (including inspection and testing).

Maintenance of the QCP will be the responsibility of Sevenson's Quality Control Manager (QCM). The QCM will be responsible for ensuring that all materials and work comply with the contract specifications. All inspection and testing firms will be at the disposal of the QCM to ensure that all aspects of work are compliant with the contract. The QCM will report any deviations from the QCP independently to Sevenson's Corporate Project Manager. Mr. William Zambrana is designated as Sevenson's QCM at the site.

II. PROJECT ORGANIZATION

Sevenson's managers and personnel assigned to this project possess a broad range of remedial action experience and skills. All have been involved with the handling of contaminated wastes at Hazardous, Toxic, and Radioactive Waste (HTRW) sites and are familiar with requirements of day-to-day work under this contract.

Sevenson's proposed project organization for this project and the resumes of key personnel, along with their job titles, can be found in Appendix A.

The functional responsibilities of key technical personnel are summarized below.

HOME OFFICE PERSONNEL

Laurence Elia – Vice President

Mr. Elia will ultimately be responsible for the project's success. He will provide the required Sevenson resources to ensure that the ProjectName project is successfully

executed. He will be kept informed of the project's progress and maintain that the project is meeting its goals. Mr. Elia will resolve problems that cannot be resolved by the On-site Project Manager or Project Administrator. He will periodically visit the site and become acquainted with field personnel and procedures.

Alfred LaGreca - Project Administrator (PA)/Corporate Project Manager (CPM)

Mr. LaGreca will oversee the project at the corporate level and report directly to the Vice President. He will communicate with the onsite Project Manager regarding all aspects of the project including, but not limited to, project problems, progress, payments, schedules, administrative duties, and QCM oversight.

Paul Hitcho, Ph.D., Certified Industrial Hygienist (CIH) - Corporate Director of Health and Safety

Regarding safety and occupational health, Sevenson will:

- Maintain overall responsibility of SiteName Site safety.
- Be responsible for assigning Site Safety and Health Officer (SSHO) responsibilities.
- Ensure that all activities are carried out in compliance with the approved site Safety and Health Plan.

Sevenson's corporate safety program is managed in-house by an AIBH-certified Industrial Hygienist, Dr. Paul Hitcho, PhD, CIH. Dr. Hitcho is responsible for the preparation, implementation, and enforcement of the site-specific Safety, Health, and Emergency Response Plan (SHERP). Sevenson's SSHO will report site safety activities to Dr. Hitcho on a regular basis, including all safety and occupational health issues. All job safety records generated will be thoroughly reviewed by Dr. Hitcho, who will also perform quarterly job-site safety inspections. He will prepare an audit report of findings for each inspection, including identification of deficiencies requiring corrective action.

Dr. Hitcho will supervise the SSHO, review the respirator qualitative fit tests, and develop

the air monitoring program. He will make periodic trips to the site to conduct safety audits, observe the administration of this plan, and make any necessary modifications to the program.

Kenneth Paisley, CHMM - Regulatory Specialist

Mr. Paisley is responsible for regulatory compliance on all Sevenson projects. He is committed specifically to overseeing all field sampling and chemical data acquisition plans, and is the point of contact with off-site laboratories. Mr. Paisley will review laboratory reports with our selected lab to ensure compliance with project specifications and all required protocols. He will coordinate off-site waste removal, including transport, disposal, manifesting, waste profiles, regulatory compliance, and disposal requirements.

FIELD PERSONNEL

Kim W. Lickfield, On-site Project Manager

Mr. Lickfield, Sevenson's On-site Project Manager, will be the contact person with whom USACE will deal with on a daily basis under this contract. Mr. Lickfield will ensure that:

- Appropriate Sevenson and subcontractor resources are allocated to the project and balanced to ensure best value to the USACE.
- All cost tracking and reporting is carried out in a manner compliant with USACE Contract Management Procedures.
- All tasks are conducted in accordance with the site SHERP and project specifications.

Sevenson field personnel may rely on home office support throughout the course of the project. Mr. Lickfield reports directly to Sevenson's PA/CPM, Al LaGreca. When problems arise that cannot easily be rectified in the field, Mr. LaGreca and Mr. Elia will become and remain personally involved until each problem is resolved and appropriate corrective measures are implemented. Mr. Lickfield will normally communicate with Mr.

LaGreca at least once daily on the progress of the project. Mr. LaGreca will be present on the jobsite as required, to ensure that the project is progressing as scheduled.

As Project Manager, Mr. Lickfield is responsible for implementation and support of Sevenson's QCP at the Cornell-Dubilier Superfund Site. He will oversee all aspects of work under this contract for remediation at the site, including:

- All procurements.
- List other remedial activities here.

His responsibilities include:

- Contractor coordination.
- Acting as site liaison between Sevenson and USACE.
- Maintaining charge of all field operations.

William Zambrana-Quality Control Manager (QCM)

As Quality Control Manager, Mr.Zambrana will report directly to the PA/CPM with matters concerning quality control. He will have both the authority and the duty to halt any operation appearing to be out of compliance with contract specifications.

The QCM is responsible for keeping and maintaining all records related to personnel, supplies, equipment use, and equipment calibration and sampling. His functions will be as defined within the contract specifications and as referenced in the Quality Control Documents.

QCM responsibilities include:

- Performing and documenting field inspections.
- Preparing daily Quality Control Reports.
- Scheduling, reviewing, certifying, and managing project submittals.
- Maintaining the Submittal Register.
- Providing coordination of required quality control testing, reviewing results, and submitting.

- Coordinating, documenting, and tracking preparatory, initial, and follow-up inspections.
- Tracking construction deficiencies and ensuring timely corrective action.
- Coordinating field sampling activities (as required).
- Reviewing calibration of test equipment (as necessary).
- Preparing addenda to the QCP as necessary when additional phases of work are added.
- Maintenance of as-built drawings.
- Coordinating responses to vendors' requests for information and technical issues.
- Serving as main point of contact for USACE questions and discussions on quality and technical issues.
- Delegating duties to alternate QCMs and notifying USACE to whom what duties have been delegated.

The QCM or an alternate must be on-site when work is being performed.

Ben Faery - Alternate Quality Control Manager

As Alternate Quality Control Manager, Mr. Faery will have the same duties and responsibilities as the Quality Control Manager, William Zambrana. Mr. Faery will function as the QCM in the absence of Mr. Zambrana.

Sam Tavelaris - Site Safety and Health Officer (SSHO)

As Site Safety and Health Officer, Mr. Tavelaris will report to Sevenson's Certified Industrial Hygienist and be responsible for the implementation of the approved site SHERP, including conducting required safety inspections, safety briefings, and reports of safety-related activities. He has received 40-hour HAZWOPER training per 29 CFR 1910.120(e), and possesses current Red Cross First Aid and CPR training.

Wayne Kostuk-Superintendent

Mr. Kostuk will be responsible for supervising all field activities, including construction on the ProjectName project. His duties include supervision of Sevenson's craft labor (equipment operators, truck drivers, and laborers), technical staff (survey crew), and all subcontractors.

III. QUALITY CONTROL

The QCP will be implemented in order to ensure compliance with the specifications for remedial action construction as detailed in the contract specifications.

Prior to the initiation of work, the QCM will meet with USACE to discuss Sevenson's quality control system. During this meeting, a mutual understanding of the system's details will be developed, including forms for recording (presented herein), control activities, testing, and administration of the system for both on-site and off-site work.

Quality control measures will extend to field sampling procedures; staffing; types of material and equipment to be used; and methods of performing, documenting, and enforcing quality control operations of both the prime contractor and subcontractors (including inspection and testing).

As previously stated, maintenance of the QCP will be the responsibility of the QCM. The QCM will be responsible for ensuring that all materials and work comply with the contract specifications. The QCM may have a Field Engineer at his disposal to assist him with the on-site inspections. Testing firms will be at the disposal of the QCM to ensure contract compliance in all aspects of work. All testing firms' qualifications will be submitted to the engineer for approval. All reports from testing firms will be forwarded to the QCM for his review and approval. Testing firms hired to perform chemical analysis will be required to comply with the requirements listed in the Sampling and Analysis Plan and must be validated by ClientName prior to conducting work.

IV. CHEMICAL QUALITY CONTROL

Should environmental/chemical sampling be required, the QCM will be responsible for oversight

of the Chemical Quality Control Program as part of the site QCP. Sevenson will use the approved Field Sampling Plan and Quality Assurance Plan components of the Sampling and Analysis Plan.

V. BASIS OF CONTRACTOR QUALITY CONTROL PLAN

The basis of the QCP is nationally recognized standards published by the American Society for Testing and Materials (ASTM), the New Jersey Department of Transportation (NJDOT) and the USACE's specifications. In addition, procedures utilized within the QCP reflect the experience gained by Sevenson in completing construction projects similar to the Cornell-Dubilier project.

VI. IMPLEMENTATION

The QCM will be responsible for implementing the QCP by ensuring that quality materials and supplies are provided for the proposed project, and that good workmanship is provided in all aspects of this contract. Sevenson's QCM will report directly to the home office administration (PA/CPM) and will complete daily site inspections to ensure compliance with the quality control specifications. Daily reports will be completed listing all field testing and sampling activities. These reports will be submitted to the USACE's representative on a daily basis. The QCM will be responsible for ensuring that all materials and work comply with the contract plans and specifications and that all performance standards are met.

As additional features of work are added, addenda to the QCP will be submitted detailing updated lists of Definable Features of Work, updated lists of quality control testing, and other additional quality control information specific to the additional phases of work.

VII. REPORTING

The QCM will record control activities in a daily quality control report maintained on site at all times. All site activities, site inspections, and field testing of materials will be recorded on a daily basis, along with any unacceptable site occurrences or deficiencies and their associated corrective actions. Each daily entry into the report will be signed by the QCM. Quality Control Reports will be submitted on a daily basis during all field construction activities. Sevenson will utilize the USACE's RMS system with forms updated as provided by the USACE.

VIII. INSPECTIONS

To ensure that all construction and remedial activities comply with the project specifications, the QCM will complete, in conjunction with the subcontractors, three phases of site inspections for each feature of work. These inspections will include the following:

PHASE I - PREPARATORY INSPECTION

Preparatory inspections will be performed prior to beginning work on any definable feature of the project and will include:

- Reviews of contract requirements.
- Reviews of applicable Activity Hazard Analyses and associated administrative and engineering controls to be employed.
- A check to ensure that all materials and/or equipment have been tested, submitted, and approved.
- A check to ensure that provisions have been made to provide required control testing.
- Examination of the work area to ascertain that all preliminary work has been completed.
- A physical examination of materials, equipment, and sample work to ensure that they conform to approved shop drawings or submittal data and that all materials and/or equipment are on hand.

Subsequent to the preparatory inspection and prior to commencement of work, Sevenson will instruct each applicable worker on the level of workmanship required to meet contract specifications.

PHASE II - INITIAL INSPECTIONS

Initial phase inspections will be performed as soon as a representative portion of the

particular feature of work has been accomplished. Initial inspections include, but are not limited to, examination of the quality of workmanship; review of control testing for compliance with contract requirements; and identification of defective or damaged materials, omissions, and dimensional requirements.

The initial phase inspection is the time to discuss and agree on the required level of quality associated with a given work activity. Any discrepancies relative to work quality should be addressed at this time.

PHASE III - FOLLOW-UP INSPECTIONS

Follow-up inspections will be performed daily as work progresses to ensure continuing compliance with contract requirements, including control testing, until completion of the particular feature of work. Final follow-up inspections will be conducted and deficiencies corrected prior to beginning new work.

The QCM will notify the USACE at least 24 hours in advance of any inspections. Notification and meeting minutes of all inspections will be recorded in the Daily Quality Control Report. Examples of the inspection forms to be utilized are presented at the end of this document.

FINAL FOLLOW-UP INSPECTIONS

At the completion of all work, or any increment thereof established by a completion time stated in the specifications, the QCM will conduct a final follow-up inspection of the work. The USACE's representative will be given at least 24 hours notice of all inspections. The QCM will develop a "punch list" of items that do not conform to the approved plans and specifications. This list will include the estimated date by which the deficiencies will be corrected. The QCM or his staff will perform a second completion inspection to ascertain that all deficiencies have been corrected.

Following completion of all inspections at the end of the construction, a series of pre-final and final inspections will be conducted by the QCM. ClientName's representative will be

advised of all pre-final and final inspections at least 5 days in advance.

FINAL COMPLETION INSPECTIONS

Pre-final and final inspections will take place after all individual final follow-up inspections are completed, and all punch list items corrected.

The QCM will conduct pre-final inspections to identify deficient areas of work, and develop a punch list of items requiring correction. Once all punch list items have been corrected, Sevenson and USACE will conduct a final inspection, noting any deficient areas of work. After correcting any deficiencies, USACE and Sevenson will conduct a final inspection, leading to acceptance of the work as complete.

The completion inspection(s) and any required deficiency corrections will be accomplished within the time stated for completion of the entire scope of work or any particular increment thereof if the project is divided into increments by separate completion dates.

IX. FIELD TESTING PROCEDURES

Sevenson will conduct field-testing to verify that control measures are adequate to provide a product that conforms to contract requirements.

Field testing shall be conducted under the auspices of the QCM and he or his designee shall:

- Arrange for, or conduct, field testing in accordance with applicable test parameters (ASTM, etc).
- Verify that facilities and testing equipment are available and comply with testing standards and ensure that testing facilities are validated.
- Check test equipment calibration data against certified standards.
- Verify that all tests are documented and submitted as part of quality control system reporting.
- Review all test documentation prior to submittal.

X. **DEFICIENCY TRACKING SYSTEM**

Throughout the course of the project, deficiencies will be recorded by use of a deficiency tracking

system in which a master list of outstanding deficiencies will be maintained by the QCM.

The QCM will list any deficiencies noted during the course of project work and both Sevenson

and the USACE representative will sign-off when each deficiency is corrected. During the quality

control portion of the weekly progress meeting, a review will be held to ensure that the master list

of outstanding deficiencies is kept up to date. During these meetings, discussions will be held on

the inspection, addition, corrective actions, re-inspection, and ultimate removal of items from the

deficiency list. Minutes will be recorded and copies given to the USACE. Both Sevenson and the

USACE's representative will sign-off on the master list of outstanding deficiencies once

appropriate corrective actions have been implemented. An example master quality control

deficiency list is included at the end of this document.

XI. **SUBMITTALS**

> A submittal register listing major submittals will be prepared by Sevenson and submitted to the USACE for approval. This register has been prepared in conjunction with the anticipated progress schedule. The QCM will follow standard procedures concerning submittals, including the use of the submittal register, transmittal form 4025, and cross-indexing the register and transmittals, etc.

Each transmittal may contain more than one submittal specific to that specification section.

Transmittals shall be numbered sequentially in the following manner:

New Transmittals: Spec section – transmittal No.

Example:

01450-1

Revisions: Spec section - transmittal. revision

Example:

01450-1.1

SUBMITTALS REVIEW - NORMAL PROCESS - The QCM will be responsible for the review and

approval of submittals prior to their submittal to the USACE. This includes reviews of materials and suppliers' catalog cuts, as well as subcontractor submittals. The QCM will review the submittal for completeness and compliance with the contract specifications. Variations to a submittal will be noted on the transmittal form 4025. The QCM will actively participate during procurement activities to ensure purchase orders and subcontracts comply with the contract.

It is anticipated that the USACE's representative and Sevenson's QCM will meet frequently in order to forecast and/or prevent any potential problems from arising. An on-site quality control meeting will be conducted on a weekly basis as part of the weekly progress meeting in order to review performance during the previous one-week period, and to prepare for the upcoming two-week period. It is anticipated that Sevenson's On-site Project Manager, QCM, Superintendent, SSHO, and USACE's representatives will attend this meeting.

XII. AUDITS

An auditing system will be established to verify implementation and make determinations regarding the effectiveness of the QCP. The on-site project manager will be responsible for inspecting quality control records to ensure contract compliance. These inspections will occur, at a minimum, on a monthly basis or more frequently as deemed necessary. An inspection report will be compiled by the on-site project manager in the form of a checklist and will include a review of reports and procedures, quality of ongoing construction, personnel, laboratories (on-site and offsite), deficiency tracking, and subcontractors. The audit report will be forwarded to QCM for his review (information only). An example of the auditing form to be utilized is presented at the end of this section. All non-compliance conditions will be identified during the audit and will be reaudited to verify that the appropriate corrective action(s) has/have been performed.

XIII. DOCUMENTATION

All testing results will be recorded on the daily quality control report. Any concerns or deviations from the required material specifications and the actions taken to correct the problems will be noted on the report. Information recorded on the daily quality control report will include:

- Definable features of work that were addressed.
- Description of trades working on the project.
- Numbers of personnel.
- Weather conditions.
- Types and numbers of tests performed.
- Results of testing.
- Nature of defects or cause for rejection.
- Proposed corrective action(s).
- Corrective action taken and date.
- Delays encountered.
- Directions received from the QCM and actions taken.
- Disagreements and how they were resolved.
- Health and safety issues or deficiencies and how they were resolved.

XIV. REVISIONS TO WORK

Sevenson will be responsible for ensuring total compliance of field work to the project specifications. Should modifications or revisions to the specifications become necessary, Sevenson will make the request, in writing, to the USACE. Approval from the USACE must be received prior to allowing the modifications or revisions to be made in the field. The QCM will be informed of and record all such requests in his daily log and on the daily quality control report.

The QCM will also be responsible for the maintenance of as-built drawing information and site surveys.

XV. DEFINABLE FEATURES OF WORK

Listed below are the general categories and types of work that will be performed under this contract. These items, known as Definable Features of Work, have been grouped into the various categories in which work will be performed, and correlate to measurement and payment. Suitable quality control methods and procedures will be utilized in order to ensure that all work is performed to the standards and quality required by the specifications.

CATEGORY/TYPE OF DEFINABLE FEATURE OF WORK

- PROJECT PHOTOGRAPHS
- MOBILIZATION
- SAMPLING
- SECURITY
- SURVEYING
- HANDLING AND DISPOSAL OF DRUMMED & HAZARDOUS MATERIALS
- DEMOLITION
- EXCAVATION
- BACKFILL & COMPACTION
- TRANSPORTATION & DISPOSAL
- GEOTEXTILE
- STORAGE TANK REMOVAL
- BITUMINOUS PAVEMENT
- FENCING
- ASBESTOS HAZARD CONTROL ACTIVITIES
- REMOVAL & DISPOSAL OF PCB's
- HANDLING OF LIGHTING BALLASTS
- UTILITY MAINTENANCE
- WATER TREATMENT/DISPOSAL
- DEMOBILIZATION

XVI.---- WORK PLANS

The following work plans will be prepared by Sevenson which will contribute to the overall quality objectives for the site:

- Above Ground Tank Removal Plan
- Demolition Plan
- Dewatering Plan
- Dust Control Plan
- Soil Erosion and Sediment Control Plan
- Excavation and Materials Handling Plan
- Excavation Support Plan
- Haz Mat Security Plan
- Security Plan
- Sampling and Analysis Plan
- Site Safety and Health Plan
- Spill Prevention and Control Plan
- Lead Awareness Plan
- Pest Control Plan
- PCB Plans
- Underground Storage Tank Removal Plan

Preparatory Phase Checklist Cornell Dubilier Superfund Site Contract: **Date Preparatory Held: Definable Feature of Work:** Spec. Section & Paragraph **Drawing Sheet Numbers Major Definable Feature:** 1) Personnel Present Name **Position** Company 2) Has each spec. paragraph, drawing, and shop drawing detail been studied? Yes ___ No Transmittals Involved 3) Number and Item Code Contractor/Government Approval C-1 Have all items involved been approved? No 1. Are all materials on-hand? Yes ____ No ___. Are the materials on the job-site to be incorporated the same as those approved? Yes No Have all materials been checked for contract compliance against approved shop drawings? Yes ____ Equipment to be Used in Executing the Work: Items not on-hand or not in compliance with transmittals: Tests required in accordance with contract requirements: 2. **Test** Paragraph 3. **Accident Prevention Planning - Hazard Control Measures:** Activity Hazard Analysis - Sevenson SHERP

F-1 Applicable Outlines (Attach completed copies)

Activity Hazard Analysis

Activity	Hazard(s)	Controls

F-2 Operational Equipment Checklist Attached For:
On File For:
 Have procedures for accomplishing work been reviewed with appropriate people? Yes No
Scope of Work/Method of Construction:
Safety Issues:
Spill Prevention Issues:
5. Has all preliminary work been accomplished in accord with contract requirements and is this segment of work ready to start? Yes No
H-1 Explain any problems:
1. Remarks: CQCSM Comments:
Contractor's Comments:
CQM Project Engineer

Operational Equipment Checklist Cornell Dubilier Superfund Site

Date:	
Equipment Cl	ormed By: Criteria Safety Equipment □ Lights
□ Backup alarm □ Fire extinguisher □ Seat Belt □ Horn □ Windshield □ Other Physical Inspection □ Evidence of contamination □ Certificate of Decontamination □ Damage to frame, body and/or operable parts □ Hoses □ Fluid Levels	
Evaluation Cr	iteria
Sat	ety Equipment
	Lights
	Backup alarm
	Fire extinguisher
	Seat Belt
	Horn
	Windshield
	Other
Ph	ysical Inspection
0	Evidence of contamination
	Certificate of Decontamination
	Damage to frame, body and/or operable parts
В	· · · · · · · · · · · · · · · · · · ·
	Fluid Levels
	Tires/Tracks
	Other
Name of I	nspecting Person Date
Signature	of Inspecting Person

Initial/Follow-Up Phase Inspection Checklist Cornell Dubilier Superfund Site

Ins	pection Type:	□ Initial Phase	□ Follow-Up Phase
Da			Specifications Paragraph:
Des	scription and Loc	cation of Work Inspect	eted:
	-		
	-		
Reference Contract Drawings: A. Personnel Present			
A.	Personnel Prese	nt	
			Company
В.	YES		ompliance With The Contract Plans and Specifications
c.	Requirements O		•
	-		
D.	-	-	NO State Areas Where
E.	Safety Violation	s and Corrective Action	ons Taken:
F.	Remarks:		
			
	Quality Control	Representative	Project Engineer

Final Phase Inspection Checklist Cornell Dubilier Superfund Site

Da	ıte:	Specifi	ications Paragraph:	
De	finable Feature of Work:	_		
De	escription and Location of Work I	nspected:		
	-			
	-			
Ref	ference Contract Drawings:			
A.	Personnel Present			
	Name	Position	Company	
В.	Materials Used In Strict Complia YESNO If not, explain:		ct Plans and Specifications	
C.	Procedures And/Or Work Meth- Requirements Of The Contract S If not, explain:		-	
	-			
D.	Workmanship Is Acceptable. \text{ \text{Y}} Is Needed:	/ESNO Sta	ite Areas Where Improvement	
E.	Remarks:			
	Quality Control Representative		Project Engineer	

MASTER QUALITY CONTROL DEFICIENCY LIST

Cornell Dubilier Superfund Site

Contract Number:				Prime Contractor:						
No.	Date	Location	Description of Deficiency	Corrective Action	Correctio n Date	CQCSM/ QAR Init.		Remarks		
1										
2										
3										
4										
5				·						
6			:							
7										
8										
9		•								
10										
11										
12										
13										

Daily Quality Control Report date

)	Project: Cornell Dubilier Superfund Site		Contract:	
	Deport No.	Contract Days	Location: South Plainf Job No.	ield, NJ
	Report No.	Contract Day:	JOD NO.	<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>
	Weather Summary:		Temperature: High:	Low:
	Precipitation Summary:		Work Hours:	
	Description and Location of Marks			
	Description and Location of Work:			
	•			
	Work Performed by Sevenson:			
	•			
	• Sevenson Subcontractors On-Site No.	. Subcontractor I	Porconnol	
	• No.	. Subcontractor i	e i soime i	
	•			
	Work Performed by Sevenson Subcontract	ctors:		
	Equipment Brought To or Token from the	Site by Savanae		
	Equipment Brought To or Taken from the	Site by Sevenso	(1),	
	Material Brought To or Removed from the	Site by Sevenso	on:	
	•	·		
	General Observations:			
	Observations During Training:			
,	•			
	Verbal Instructions to Sevenson from USA	ACE:		
	 Issues Which May Lead to Potential Modif 	fication(s):		
	•			
	Sevenson Safety Issues:			
	Man-hours Worked This Period:	Total Man-ho	ure To Date:	
	Man-nouis Worked This Fellod.	i Otal Mail-110	uis 10-Date.	
	Sevenson Visitors to the Site:			
	04			
	Other:			
	Certification: I certify that the above report in	is complete and c	orrect, and that I, or my a	uthorized
	representative, have inspected the work perfe	formed this day by	the Prime Contractor an	d each
	subcontractor and determined that all materia		nd workmanship are in sti	ict compliance with
	the plans and specifications, except as noted	above.		
	CQM	Date		

Environmental/Spill/Soil Erosion Protection Review Cornell Dubilier Superfund Site

	on Control Barriers r Types In-Place and Functional?:
	Silt Fence Location:
	Hay Bales Location:
	Trenches Location:
0	Other Location:
	Other Location:
	Storm drains protected?
0	Mud mats in-place and functional (i.e., not loaded with mud)?
	Stockpiled soil protection in-place?
Spill F	Response:
	Storm drain spill protection equipment on-hand (absorbent booms, sand, bentonite, etc.)
	Spill response equipment/materials on-hand
	Trained response personnel on-site
0	Spill Hotline Number posted conspicuously in multiple locations
Gene	al Environmental Protection:
0	Location of on-site fuels storage
	Noise Control/Monitoring
0	Dust Control/Monitoring
	Proper housekeeping
	Date:
	
	CQM

Daily Safety Log – Cornell Dubilier	Superfund Site
Date:	Work Period Covered:
Weather Conditions: Temperature: High Low	•
Summary of Day's Work Activities:	
Equipment Utilized by Safety Monit	tors:
Protective Clothing and Equipment	t Being Used (by task):
Physical Condition of Workers (not	te any heat or cold stress or other medical problems)
Accidents or Breach of Procedures	ş:
Description of Monitoring and Sam	ples Taken:
Miscellaneous:	
Name:	Title: Safety and Health Officer
Signature:	

Field Monitoring Results Cornell Dubilier Superfund Site								
Field Monitoring Results - Cornell Dubilier Superfund Site Prevailing Wind Direction:								
Date:								
Time	Instrument	Location	Reading					
		,						
		The state of the s						
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		, , , , , , , , , , , , , , , , , , , 						

Name: Title: Site Safety Signature:	and	Health	Officer		
Field Samula Callestian Charletian					
Field Sample Collection Checklist Project Name/Job Number: <u>Cornell Dubilier Superfund Site</u>	L				
Sampling Location:			•		
Sampling Date:					
Complete this form for each sampling location inspected. Answer each	anes.	tion by	checkir	na the	
appropriate column (yes, no, not observed (N/O), or not applicable (N/A	-			-	le an
explanation of the non-compliance and associated corrective action(s).	.,			, p . 0 1. 0	
General		Yes	No	N/O	N/A
Were new protective gloves worn between sampling locations and/or interva	ıls?□				
	ם				
Were sample containers filled in the appropriate order?					
Was sampling equipment appropriate for the purpose and site conditions?					
Was sampling equipment decontaminated or disposable/ded	icated	equipm	ent		
used between each sample?					
Were procedures for collecting QA/QC samples followed as per the FSF?					
Were sampling locations properly identified by land survey?					
Were bottles adequately protected from contamination prior to sample collec	tion?⊏	3 0			
Field Sampling for Chemical Analysis					
Were sampling parameters stable before sample collection (as per the FSP)?	7		0	0	
Was a field sampling form completed?					
Were the analytical parameters and QA/QC samples recorde	_	_		_	
sampling form?				0	
Was head space in sample contained for volatiles eliminated?					
Were trip blanks labeled and sent with samples as designated in the FSP?					

QC Inspector Name and Signature:

Date:

Decontamination Checklist

Project Name/Job Number: Cornell Dubilier Superfund Site

Sampling Location: Sampling Date: Complete this form for each sampling location inspected. Answer each question by checking the appropriate column (yes, no, not observed (N/O), or not applicable (N/A). If "no" is checked, provide an explanation of the non-compliance and associated corrective action(s). Equipment N/A Yes Was all sampling equipment decontaminated properly prior to use and between sample intervals? Was each decontamination event recorded in the log book? Was IDW (decontamination water) handled properly? **Notes/Comments** QC Inspector Name and Signature: Date:

Field Documentation Checklist

Were all field forms completed and information accurately recorded: Field Sampling Forms Chain of Custody Forms Field Log Books List (any) additional forms completed: Was field documentation forwarded to Sevenson office for peer/QC review? □	ield Documentation Vas all original field data recorded in black indelible ink?	<u>Yes</u>	<u>No</u>	<u>N/A</u>
Chain of Custody Forms Field Log Books List (any) additional forms completed: Was field documentation forwarded to Sevenson office for peer/QC review? □ □ □		•	a	
Field Log Books List (any) additional forms completed: Was field documentation forwarded to Sevenson office for peer/QC review? □ □ □	•			
List (any) additional forms completed: Was field documentation forwarded to Sevenson office for peer/QC review? □ □ □	Chain of Custody Forms	-		
Was field documentation forwarded to Sevenson office for peer/QC review? □ □ □	Field Log Books			
• • • • • • • • • • • • • • • • • • • •				
Were deficiencies reported to the Field Sampling Manager?	• · · · · · · · · · · · · · · · · · · ·			
Notes/Comments	otes/Comments			

Packing, Storing, and Shipment of Samples Checklist

Project Name/Job Number: Cornell Dubilier Superfund Site Sampling Location: Sampling Date: Complete this form for each sampling location inspected. Answer each question by checking the appropriate column (yes, no, not observed (N/O), or not applicable (N/A). If "no" is checked, provide an explanation of the non-compliance and associated corrective action(s). Packing, Storing, and Shipment of Samples Δ Were the samples handled according the FSP and QAPP? \Box Did the samples remain on ice or refrigerated (except for sample transfer from coolers or refrigerators) from collection until the cooler was taped for shipment? Were Chain of Custody forms filled out accurately and completely including the project name and number, sampling date and time, analytical parameters, preservatives, size and number of containers for each analytical parameter, and media sampled? Were Chain of Custody forms signed and dated by the preparer and the form taped to the inside of the cooler lid? Were signed and dated custody seals properly placed on the cooler and the cooler sealed with strapping tape? Was a shipping label attached to the cooler? **Notes/Comments**

QC Inspector Name and Signature:

Date:

Progress Meeting Agenda Cornell Dubilier Superfund Site



1. Attendees at Meeting
2. Corrections, Review, and Approval to Previous Minutes
3. Health and Safety
= manMan-hours worked on the site (StartDate- to-date), with zero recordable, reportable or work time lost
injuries or incidents.
Safety Deficiencies (see Master Safety Deficiency List)
••••• y = ((y = y
4. Work Progress
5. Field Observations, Problems, and Conflicts
6. Work Schedules Problems Which Impade the Schedule
Problems Which Impede the Schedule Review of Off-site Delivery Schedule
Corrective Measures to Regain the Project Schedule
Revision to the Project Work Schedule
Two Week Look Ahead
4.7. Quality Control
Quality Control Summary Reports - submitted through the week of
Preparatory Inspections -
Initial Inspections ~
Final Inspections -
Other Inspections -
Quality Control Deficiencies (see Master Quality Control Deficiency List)
5.8. Extra Work
67 Worls Cahadula
6.7. Work Schedule Review of Work Since Last Meeting
G

Problems Encountered Last Period:
•
Regular and Preventive Maintenance Activities

Two Week Look-Ahead

CQM Date	
The above minutes represent the undersigned's interpretation and any understanding of what too the meeting. Any misunderstanding or misinterpretation should be forwarded to the undersign writing - for incorporation into the minutes.	
The next Project Meeting will be held	
•	
11)12. Other Business	
•	
10)11. New Action Items	
•	
9) 10. Review of Old Action Items	
8) Visitors to the Site	
7)9. Community Relations/Public Affairs Issues •	
•	
6)Permit Activities	
• Critical:	
 Plans Submitted: Plans Reviewed: 	
5)8. Submittals Update	
•	
4)Changes to Specifications □	
A) Classes at a Consci Continue	
Equipment Failure and Emergency Events Summary	
.	
	

Sevenson Environmental Services, Inc.©

Meeting Attendees

Attachments:

CHECK LIST FOR MANIFESTCornell Dubilier Superfund Site

- □ MANIFEST NUMBER:
- **□ WASTE GOING OUT:**
- □ SHIPMENT DATE:
- □ TRAILER OR BOX NUMBER:

DRIVER AND TRAILER:

- Driver Licensed for Hazardous Waste Hauling (Class A CDL and required endorsements).
- □ Truck and Trailer Inspection Decals Current.
- □ Truck and Trailer License Plates Current.
- □ Truck and Trailer New Jersey DEP Decals Current.
- ☐ Trailer has Placards on All (4) Sides.

MANIFEST:

- Uniform Manifest Shall Have POC with 24 Hr Phone Number other than US Government.
- Check All ID Numbers on Forms.
- □ Signature Block Shall be "On Behalf of USEPA", and signed by USACE personnel.
- Current Profile (Waste) for Receiving Facility:
 Facility Acceptance Number Must Be Within 1 Year.

LOADS:

SLUDGE:

- □ Check (Visual) Inside Box for:
- ☐ Free Standing Liquids (Assure that Trucker See You).
- No Other Miscellaneous Wastes Than That Specified on the Uniform Manifest.
- □ Ensure That The Box Left Has New Clean Plastic Liner and Cover.
- Check (Visual) the Tarp For Cuts, Rips or Any Other Defects Which May Allow "Free Standing Liquids" if Rained On.

LIQUIDS:

- □ Check (Visual) For Structural Inspection Dates (Tankers) Are Current.
- □ Have Trucker Dip Tanker Prior To Filling And After Filling For Estimate Of Gallons.

DRUMS

- □ Are all drums properly labeled and marked?
- □ Are all drums DOT-shippable (structurally sound, non-leaking, etc.)?
- □ Other

	SMITTAL OF SHOP D LES, OR MANUFACT (Read instructions of	TURER'S (COMPLIAN		ATE	.			TRANSMIT	TAL NO.	
SECTIO	NI-REQUEST FOR				(This section	n will be initi	iated by the	contrac	tor)			
	TO:		FROM:Sevenson E Services, 2749 Lockpo Niagara Falls, New	Inc. rt Road	THIS IS A NEW T ad THIS IS A RESULE k 14305 TRANSMITTAL							
	ATION SEC. NO: (Cover or h each transmittal)	nly one	PROJECT TITLE ANI	D LOCATION:						ONE: THIS TRA ☐ GOVT. APPRO		FOR
ITEM NO.		ON OF ITEM S ze, model nun		CAT., DRAW	MFG OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO. (See instruction No. 8) C.		SPEC. DRA PARA SH NO. N			FOR CONTRACTOR USE CODE	VARIATION (See Instruction	FOR CE USE
a.		b.		(See inst					WING EET IO. f. g.		No. 6)	CODE i.
			·		·							
		<u></u>										
REMARKS	S		· · · · · · · · · · · · · · · · · · ·				are correct	t and in ons excep	strict co	itted items have be informance with the rwise stated.		
								NAME A	AND SIG	NATURE OF CO	ONTRACTOR	
	N II – APPROVAL AC											
ENCLOSU	JRES RETURNED (List by	Item No.)	NAME, TIT	LE AND SIGNA	TURE OF A	PPROVING	AUTHORI	TY	DAT	E		
ENG FOR	M 4025-R, MAR 95	(ER 415-1-	10) EDITION O	F SEP 93 IS OF	SOLETE	SHE	ET1_ OF	:_1_		(PRO	OPONENT: CE	MP-CE)

INSTRUCTIONS

- Section 1 will be initiated by the contractor in the required number of copies.
- 2. Each transmittal shall be numbered consecutively in the space provided for "Transmittal No.". This number, in addition to the contract number, will form a serial number for identifying each submittal. For new submittals or resubmittals, mark the appropriate box; on resubmittals, insert transmittal number of last submission as well as the new submittal number.
- 3. The "Item No." will be the same "Item No." as indicated on ENG FORM 4288-R for each entry on this form.
- 4. Submittals requiring expeditious handling will be submitted on a separate form.
- 5. Separate transmittal form will be used for submittals under separate sections of the specifications.
- 6. A check shall be placed in the "Variation" column when a submittal is not in accordance with the plans and specifications also, a written statement to that effect shall be included in the space provided for "Remarks".
- 7. Form is self-transmittal, letter of transmittal is not required.
- 8. When a sample of material or Manufacturer's Certificate of Compliance is transmitted, indicate "Sample" or "Certificate" in Column c, Section 1.
- 9. U.S. Army Corps of Engineers approving authority will assign action cods as indicated below in space provided in Section I, Column I to each item submitted. In addition, they will ensure enclosures are indicated and attached to the form prior to return to the contractor. The Contractor will assign action codes as indicated below in Section I, Column g, to each item submitted.

THE FOLLOWING ACTION CODES ARE GIVEN TO ITEMS SUBMITTED

A	Approved as Submitted	E	Disapproved (See Attached)
B-	Approved, except as noted on drawings	F	Receipt Acknowledged
C	Approved, except as noted on drawings. Refer to attached sheet resubmission required.	FX	Receipt Acknowledged, does not comply as noted with contract requirements
D	Will be returned by separate correspondence	G	Other (Specify)

10. Approval of items does not relieve the contractor from complying with all the requirements of the contract plans and specifications.

(Reverse of ENG Form 4025-R)

Cornell	Diffier	Superfund Site

Con	tract Number:			Prime Contractor:		
No.	Specification Section	<u>Paragraph</u>	Description of Test	<u>Frequency</u>	Acceptance Critria	<u>Remarks</u>
1	<u>02320</u>	<u>3.7</u>	Backfill	One Test per 5,000 square feet	ASTM D422	
2	02320	<u>3.4.1</u>	Compaction	95% of Laboratory Maximum Density, +5 to - 3% Optimum Moisture	astm D698	·
<u>3</u>	02320	<u>2.1</u>	Certifications of Materials	1 Chemical per 5000 CY	NJAC 7:26 D	
4	<u>02320</u>	<u>2.3</u>	Controlled Low Strength Material	1 Test per 500 CY or 1 per lift	ASTM D 4832	
<u>5</u>	02320	3.7	<u>Soil Test</u>	1 Test per 500 CY or 1 per <u>lift</u>	ASTM D 2922	
<u>6</u>	02320	<u>3.7.1</u>	<u>Gradation</u>	One Test per 5,000 square feet	ASTM D422	
7	<u>02320</u>	3.7.4	Moisture Density Relationship	1 per 5000 CY	ASTM D 1557	
<u>8</u>	<u>02373</u>	<u>2.2</u>	<u>Geotextile</u>	Certificate of compliance	ASTM D 4354	
9	<u>02742</u>	2.2.1	Bituminous Material Test Reports	NJDOT Standard Specification	Test Reports	
<u>10</u>	<u>02742</u>	<u>3.1.2</u>	Bituminous Aggregate	NJDOT Standard Specification	Test Reports	
11						
<u>12</u>						
<u>13</u>						

TR		ER'S CERTIFICATES		LES, OR	DATE:	nday 13, 2006	TRAN	SMITTAL NO	<u>).</u>	
Section 1	REQUE	ST FOR APPROVAL	OF THE FOLLOWING ITE	MS (This section	will be initiated	by the contractor)		······································		
TO: U P:	SACE atrick Nejand 33 Hamilton Blvd. outh Plainfield, NJ 07080	FROM:	onmental Services, Inc. d.	l. Task Orde		023	R	This is a New Submit Rebsubmittal of Transmittal No Check One: This Transmittal is for		
							FIO _X Gov't Approva			
SPECIFIC	CATION SEC. NO. (Cover only one se	oction with each transmittal)	PROJECT TITLE AND L	OCATION:	***************************************					
	01540		Cornell-Dubilier Electr	onics Superf	und Site OU	2	South	n Plainfield,	NJ	
ITEM NO.	DESCRIPTION OF ITEM (Type, size, model nu		MFG. OR CONTR. CAT., CURVE DRAWING OR	NO. OF COPIES		REFERENCE UMENT	For Contracto r Use	VARIATIONS (See instruction	FOR CE USE CODE	
			BROCHURE NO. (See instruction No. 8)		SPEC. PARA. NO.	DRAWING SHEET NO.		No. 6)		
a.	<u>b.</u>		с.	d.	е.	f	g.	h.	i.	
1	Security Plan		3	1.3		A				
						· · · · · · · · · · · · · · · · · · ·				
	· ·									
							<u> </u>			
1 copy for I	N. Kolb, USACE, Project Field Offic E. Urbanik, USACE N. Resident (P. Mannino, USEPA Project Man	Office, NY District, 214 S	State Highway 18 N, E. Brunswick, N		are corre Specifica 080 Willia	hat the above submitted and in strict conformations except as other arms. SEME AME AND SIGNAT	mance with the wise stated.	Contract Drawing		
Section II			APPROVAL ACTION				<i>-</i>			
INCLOSUF	RES RETURNED (List by Item No		ND SIGNATURE OF APPROV		ITY		DÂTE			
	·	Neal F. Kolb, Al	t., Contracting Officer Represe	ntative						

Security Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

I. SECURITY PLAN OBJECTIVES

The principal objectives of the Security Plan include:

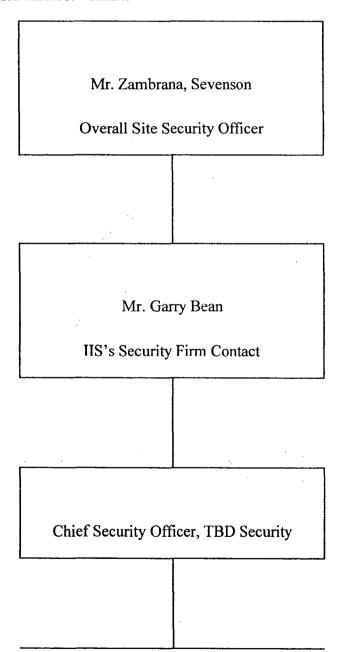
- Deterrence, restriction, and/or control of financial losses to the property owner and
 Sevenson. This includes prevention or detection of theft, vandalism, sabotage, and arson.
- Restriction of unauthorized individuals from entering the site and suffering any injuries.
- Prevention of unauthorized individuals from entering the site and removing equipment,
 personal property, or hazardous substances.
- Preemption of unauthorized individuals from taking action on the site that might exacerbate the environmental problem or interfere with its remediation.
- Ensure the security of the vacated homes during the remediation of the individual properties.

Sevenson will subcontract the on-site security service to Internal Intelligence Service (IIS), located at 9-25 Alling Street, 1st Floor, Newark, NJ, telephone number 973-242-5400. All pertinent information relating to the security force will be forwarded to the USACE during mobilization activities. IIS's experience will be forwarded under a separate submittal. A chief security officer will be designated by the security service. This person will be the responsible person whom Sevenson will deal with on a daily basis concerning security matters. Mr. Zambrana will serve as Sevenson's overall site security officer. Mr. Zambrana has 40 hours of OSHA training and will be allowed into exclusion zones to investigate any incidences.

Security will be utilized for all non-working hours and 24 hours per day for weekends and holidays, for the duration of the project to prevent unauthorized access to the site. Fencing and gates posting proper warning signs will be installed in accordance with the contract specifications as part of the security requirements. Temporary lighting will be provided, as

required, to ensure effective surveillance during evening hours. A guardhouse with an unarmed guard will be maintained at the entrance to the site.

II. SECURITY ORGANIZATION CHART



Security Force, Internal Intelligence Service

The functional responsibility of each security individual is summarized below:

Mr. Zambrana, Sevenson: Overall Site Security Officer

- Intermediary between USACE and Security Firm;
- Ensures compliance of the Security Plan;
- Maintains records of incidences;
- Investigates incidences; and
- Liaison for local police and fire agencies.

MR. GARRY BEAN, INTERNAL INTELLIGENCE SERVICE(IIS).: SECURITY FIRM CONTACT

• Formal contact between Sevenson and IIS Security.

CHIEF SECURITY OFFICER, IIS.

- Coordinates and schedules security force personnel;
- Maintains daily interface with security force;
- Makes initial contact between security force and agencies to report incidents;
 and
- Reports incidents to Sevenson's Overall Site Security Officer.

SECURITY FORCE, IIS.

 Deterrence, restriction, and/or control of financial losses to the property owner and Sevenson. This includes prevention or detection of theft, vandalism, sabotage, and arson.

- Restriction of unauthorized individuals from entering the site and suffering any injuries.
- Prevention of unauthorized individuals from entering the site and removing equipment, personal property, or hazardous substances.
- Preemption of unauthorized individuals from taking action on the site that might exacerbate the environmental problem or interfere with its remediation.
- Ensure the security of the vacated homes during the remediation of the individual properties.

III. SECURITY PERSONNEL

Requirements for employment for all security officers will include the following:

- Detailed pre-employment history establishing moral character and dependability.
- Investigation which clears applicant of felony convictions.
- Failure to maintain attentive and alert status in performance of duties, which includes sleeping while on duty and intoxication on the job, are completely unacceptable and will be grounds for not employing or for terminating employment.
- Sevenson's Site Security Officers will have 40 hours of OSHA training in an approved course meeting the requirement of Section 126(b) (2) of 29 CFR 1910.
- Site Security Personnel will have detailed knowledge of EM-385-1-1, for Government projects, and the Security Plan, and have no less than eight hours of training in the Site Safety and Emergency Response Plan. Additionally, the Security Personnel will have knowledge of their individual duties in evacuation of injured and disabled employees from both contaminated and non-contaminated areas of this project.
- Site Security Officers will be physically fit, literate in the English language,
 experienced, stable, reliable, and possess the physical and psychological skills that are
 necessary to control unauthorized persons on the site.

If the Security Officer carries a weapon consisting of side arms and/or shotgun or rifle, weapon(s) will be catalogued, including type, model, caliber and serial number and inspected by the security firm. The Security Officer will have proficiency training and maintain a proficiency rating with the particular type of weapon carried, as required by State law. Sevenson does not anticipate utilizing armed officers on this project.

IV. SITE SECURITY REQUIREMENTS

A Security Officer will be on the site 24 hours per day (including weekends or days where no activities are in progress) for the entire duration of remedial activities, once remediation activities have commenced. One security officer will be assigned to each construction area and will patrol the properties within such areas on an hourly basis. Security measures will cease in an individual area once the USACE has provided final acceptance of that area's remediation. Sevenson will be responsible for establishing security, as necessary, to protect the personal property of existing property owners/residents temporarily relocated during remedial activities, as applicable.

A security guardhouse will be established at the main entrance to the mobilization/support are for the purposes of record-keeping and administering security.

A small, temporary trailer will be equipped with a telephone, two-way radios, lights, and a desk.

Security will maintain a log of all security incidents. This log will be furnished to the USACE upon request.

Gates in all fences will remain closed to provide security of the Exclusion and Contamination Reduction Zones.

The USACE will have the right to approval and rejection of any and all security-assigned personnel of IIS for the duration of the Contract.

Security Officers will conduct surveys of the site perimeter during working hours, and hourly inspections of the entire site during off-work hours for the duration of the project. A logbook will be kept at the guardhouse to record observations of site conditions made during surveys.

Security Officers will be responsible for maintaining secure site conditions to protect against any unauthorized entry. Should individual(s) attempt unauthorized entry, the Security Officer will be responsible for warning the individuals. If unauthorized person(s) ignore the warnings, the security officer will notify appropriate law enforcement personnel to remove the person(s).

During patrols, security personnel will be in proper attire. Routes will be defined based on work activity such that security personnel can be protected from the hazardous materials.

Sevenson will maintain a current list of personnel approved to be present on the job site. A copy of such list is provided at the end of this Plan. Authorized personnel, only, may make changes to the job site list.

A copy of the emergency checklist providing all emergency numbers for hospitals, ambulance service, law enforcement, paramedics, and fire departments, will be posted in all on-site offices, and at the designated project information board.

Sevenson will contact law enforcement officials, emergency medical care units, local fire departments, and utility emergency teams to ascertain the type of response required in any emergency situation and will coordinate the responses of the various units. Sevenson will

prepare and update a list of emergency points of contact, telephone numbers, radio frequencies, and call signs to ensure dependable responses from these various agencies.

The Exclusion Zones and Contamination Reduction Zone, identified as active hazardous work areas, will be posted with signs clearly visible in each area declaring, *WARNING HAZARDOUS AREA*, *DO NOT ENTER*, *AUTHORIZED PERSONNEL ONLY*. The design of signs will conform to Section 10.6.02 of EM 385-1-1, for Government projects.

Security will make sure that the perimeter fencing and all warning signs are secure and intact on a daily basis. If deterioration of the site security fence is observed, if gates and doors are left unlocked, or if warning signs are removed, the situation will be rectified immediately. The USACE will be informed immediately of any vandalism to fences, gates, or facilities. Any acts of vandalism will also be reported to the proper law enforcement officials.

Temporary lighting will be provided to ensure effective surveillance at night in active construction areas and for dwellings where property owners have been relocated.

Lighting will be maintained for the duration property owners/residents are relocated.

V. Personnel Identification

Sevenson may provide security identification tags specific to the site for all on-site personnel and other personnel entering the site, showing:

- Name of individual;
- Occupation; and
- Name of Employer.

Sevenson will be responsible for, and guarantee, that security identification will be worn by each individual and remain visible at all times while the individual is onsite. Badge

assignments will be based on criteria included in the Site Safety & Health Plan (SSHP) or as established by Sevenson's CIH.

Additionally, visitor identification cards will be issued to visitors authorized to enter the project site.

Improperly identified personnel will be excluded from the site.

The requirement of personnel identification may be waived upon approval of the USACE.

VI. ENTRANCE CONTROL

Security will perform all of the following:

- Provide surveillance of all persons, equipment, and vehicles entering and leaving the site:
- Oblige each person to display proper identification;
- Require all personnel and visitors having access to the site to sign in and sign out, and maintain a log of all site access;
- Restrict vehicular access beyond the guardhouse to the mobilization area to
 authorized vehicles only. Restrict use of site-designated parking areas to vehicles of
 USACE, Sevenson, subcontractors, service personnel assigned to the site and actually
 on duty, and visitors approved by the USACE;
- Sevenson will accommodate and coordinate visits with local law enforcement agencies, including police, sheriff department, highway patrol, emergency medical care units, fire department, and utility emergency teams;
- Site visitors will not be permitted to enter active hazardous work areas (Exclusion Zone and Contamination Reduction Zone);

IX. Non-Permitted Procedures

Security personnel will not be permitted to direct the loading or unloading of site materials, or participate in any contract activity that will jeopardize, obstruct, weaken, or threaten site security, even on an intermittent or one-time basis.

Security personnel will, in general, monitor, authorize entry, and inspect all areas of the project on a continuing basis and will not serve any production work of the project.

Site security personnel will not be scheduled for, nor permitted to work, consecutive shifts.

The site will on no occasion be left unsecured. The site security officer will remain on duty until the next shift replacement arrives.

X. LIST OF PERSONNEL AUTHORIZED FOR SITE ENTRY

SEVENSON ENVIRONMENTAL SERVICES, INC.

- Michael A. Elia
- Alan R. Elia
- Paul C. Thomson
- Kim Lickfield
- Paul Hitcho
- William Zambrana
- Wayne Kostuk
- Sam Tavelaris

USEPA/USACE

- Pietro Mannino
- Pat Seppi
- Eugene Urbanik
- Neal Kolb
- Pat Nejand
- Ken Maas
- Garth Anderson
- Lori Vollink

LABORERS, OPERATORS, TRUCK DRIVERS, AND SAFETY STAFF TO BE NAMED AT A LATER DATE.

TBD

TR		R'S CERTIFICATES		ay 13, 2006	TRAN	<u>).</u>			
Section 1	REQUE	ST FOR APPROVAL (OF THE FOLLOWING ITE	MS (This section	will be initiated by	the contractor)			
TO: U Pa	SACE atrick Nejand 33 Hamilton Blvd.	FROM:	nmental Services, Inc.	NO.: 12DQ-04-D-002 k Order # 0005	:3	R	X This is a New Submittal Rebsubmittal of Transmittal No.		
	outh Plainfield, NJ 07080	Niagara Falls, NY					Check One: This Transmittal is for FIO X Gov't Approval		
SPECIFIC	CATION SEC. NO. (Cover only one see	ction with each transmittal)	PROJECT TITLE AND L						
	01500A		Cornell-Dubilier Electro	onics Superf		South	Plainfield, l	NJ:	
ITEM NO.	DESCRIPTION OF ITEM (Type, size, model nur		MFG. OR CONTR. CAT., CURVE DRAWING OR	NO. OF COPIES	CONTRACT R		For Contracto r Use	VARIATIONS (See instruction	FOR CE USE CODE
			BROCHURE NO. (See instruction No. 8)		SPEC. PARA. NO.	· · · · · · · · · · · · · · · · · · ·		No. 6)	
а.	b.					f.	g.	h.	i.
1	Temporary Site Facilities Plan			3	1.2	· · · · · · · · · · · · · · · · · · ·	A		
		·					·		
						···			
			:	٠.					
1 copy for E 1 copy for F c.cSES- I	N. Kolb, USACE, Project Field Office E. Urbanik, USACE N. Resident C P. Mannino, USEPA Project Mana	office, NY District, 214 Sta	te Highway 18 N, E. Brunswick, N d Office, 333 Hamilton Blvd, Sout		are correct Specification William	the above submitte and in strict conform ns except as otherw Zambrana, SES E AND SIGNAT	nance with the C	Contract Drawings	
Section II			APPROVAL ACTION						
INCLOSUR	RES RETURNED (List by Item No		D SIGNATURE OF APPROV Contracting Officer Represer		ITY		DATE		
NG FOR	M 4025, March 95 (E		OF Sept 93 IS OBSOLETE			<u> </u>	SHE	ET <u>1</u> OF	· _ 1
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Temporary Site Facilities Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

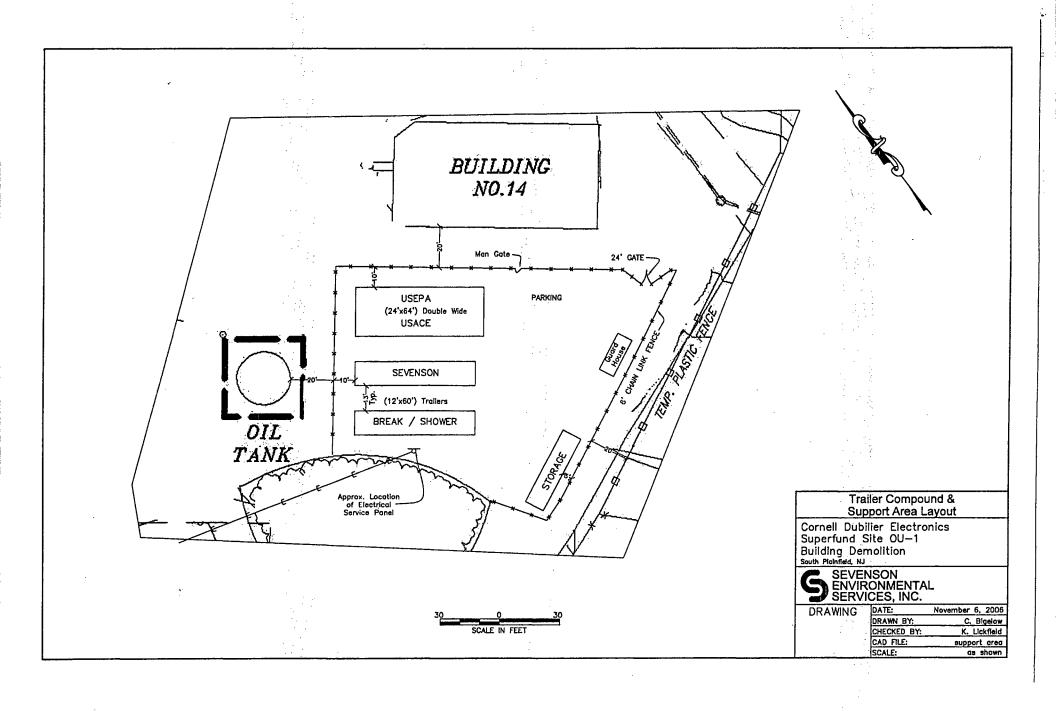
U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006



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	E. Urbanik, USACE N. Resident Of P. Mannino, USEPA Project Manag				7080		Zambrana, SES		ONTRACTOR	
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		Neal F. Kolb, Alt.	, Contracting Officer Represe	entative						

Dewatering Work Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

DEWATERING PLAN

I. DEWATERING PLAN OBJECTIVES

The purpose of the Dewatering Plan is to present the methods and procedures for handling, storage, treatment, and disposal of excavation derived water. Sevenson will be responsible for completing the work in accordance with Federal, State and local regulatory requirements. Sevenson anticipates that the USEPA will obtain the necessary permits for the disposal of treated water into Bound Brook (Dismal Brook) if an on site treatment system is provided.

II Surface Water Control

Sevenson will install berms, swales, and other measures necessary to prevent surface water from entering and exiting excavations. Surface water will be directed away from excavation and construction sites so as to prevent erosion and undermining of foundations and to prevent surface water run on from becoming contaminated by accumulating in excavations. All diverted water will be directed to existing drain ways and storm sewer systems so as to not flood adjacent structures or properties. Backfill surfaces will be protected to prevent erosion and sloughing. Other measures include covering the excavated area with polyethylene so that clean water is diverted from the excavation.

III Water Handling

Pumping of water from excavation will be conducted in such a manner as to preserve the undisturbed bearing capacity of the sub-grade soils at the excavation. Well or sump installations will be constructed with sand/stone filters to prevent drawing of finer grained soil from the surrounding ground. Pumping will be performed from these sumps/wells. A pump with a discharge hose will be utilized to pump water from excavations to an on-site storage tank. Depending upon the proximity of the excavation to the storage tank, a vacuum truck may have to be utilized to transport water to the storage tank. Water will be vacuum from the excavation, transported, and discharged into the storage tank for analysis.

IV Water Treatment

For Cluster 12, Sevenson anticipates collecting water in 1-21,000 gallon "Frac" tank. At the end of the project, the water will sampled and analyzed, and sent off site for disposal. Sevenson anticipates that approximately 10,000 gallons of water will require treatment.

DEWATERING PLAN

For the remaining clusters, pending permit approval, Sevenson proposes a water treatment plant on-site capable of treating water derived from excavation activities. The plant will consist of a 50,000 gallon Modutank for the collection and storage of water prior to treatment. Water will be treated through a series of sand filters, GAC (carbon) tanks, bag filters, and cartridge filters to remove contaminates from the water. Water will discharge into a holding tank for sampling and analysis. A formal submittal on the plants components will be provided. Once water analysis is received and reviewed with the USACE, a determination will be made on the disposition of the treated water. If the water passes analytical parameters, the treated water will be discharged into Bound Brook. Prior to receiving a discharge permit for water disposal into Bound Brook (Dismal Brook), Sevenson will contact the local POTW for approval to discharge water into their system. If the water fails treatment parameters it will be pumped back to the Modutank for additional treatment.

TF	ANSMITTAL OF SHOP DRAY	VINGS, EQUIPMENT R'S CERTIFICATES		LES, OR	2	DATE:		TRAN	SMITTAL NO	<u>).</u>
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5	outh Plainfield, NJ 07080	Niagara Falls, NY	14305					FIO _X_ Gov't Approval		
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Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

I. Introduction

The purpose of the Excavation and Materials Handling Plan is to present the methods and procedures for excavation of contaminated soil, procedures for temporary support systems; and methods for backfilling, compacting, and grading. Sevenson will be responsible for obtaining any and all permits necessary for demolition, excavation, removal of Underground Storage Tanks (USTs), operation of a dewatering system, excavation around underground utilities and as otherwise to complete the work in accordance with Federal, State and local regulatory requirements.

II. Excavation

Sevenson will, as a minimum, excavate in the areas and depths of the excavation as indicated on the Contract Drawings. Excavation of material (hazardous and non-hazardous) will occur during the removal of foundations, test pits, and underground utility locating/modifying.

Excavation of material during the demolition phase of the contract will be kept to a minimum. Only those areas designated as being excavated during foundation removal will be performed.

The material excavated will be stockpiled on site for analytical testing to determine the proper disposal facility. Sevenson anticipates testing excavated material at a minimum rate of one sample for every 500 tons or as required by the disposal facility. Analytical results will be submitted to and reviewed with the USACE prior to shipping the material off-site. No additional or over excavation of material will be performed unless authorized by the USACE.

Sevenson will not proceed with activities on any other cluster without prior written notification of the USACE.

Test pits will be excavated at predetermined locations as agreed to by the USACE. Excavated material may be sampled and analyzed if the material shows signs of contamination or as directed by the USACE. Hand excavation techniques will be utilized during test pit excavation. Typically, a small utility excavator will also be utilized during test pit excavation.

Soil erosion and sediment control measures will be implemented during excavation activities. Measures include the installation of silt fences, hay bales and geotextile, as

applicable. Dust will be controlled by spraying contaminated material with a water mist, utilizing water obtained from local fire hydrants. A water truck will be utilized to keep dust off of haul roads and as an additional source of water for remote excavation/demolition sites. Sevenson will protect existing trees, shrubs, facilities, structures, etc., by use of temporary orange safety fencing, flagging, plywood or other means, as required.

The USCE does not anticipate salvaging any materials recovered during excavation If required and appropriate, decontamination of these items will be performed prior to disposal.

All items having any apparent historical or archaeological interest that are discovered in the course of any construction activities will be carefully preserved. Sevenson will leave the archaeological find undisturbed and will immediately report the find to the USACE so that the proper authorities may be notified. Historical or archaeological finds that might require work stoppages are not anticipated to occur during construction. Contaminated finds will be decontaminated by Sevenson prior to removal from the site.

Organic materials including stumps, roots, railroad ties, and debris encountered during excavation will be considered grubbed material and will be handled, stored and disposed of as contaminated material.

Open excavations will be barricaded, fenced, or flagged to delineate this hazard.

The contaminated material will be excavated by a track backhoe. Polyethylene will be utilized to cover the side walls of the vehicle to be loaded to prevent contamination coming into contact with the exterior side walls of the vehicle. Polyethylene will also be place on the ground where the truck is being loaded to prevent the ground surface coming into contact with contaminated material. A dump truck (truck) will be placed in close proximity to the excavation, on the polyethylene, and the backhoe will load the contaminated material directly into the truck. Once the truck is loaded, the contaminated material will be covered with the liner at the excavation site and the truck will moved to a "tarping" station for final packaging. The backhoe operator will use caution while loading the vehicle to prevent the vehicle becoming contaminated. Sevenson will not excavate or load material in severe rain. Additionally, no material will be excavated in areas where water is standing. No vehicle will be shipped from the site that have free liquids in the container. Once the vehicle is weighed and covered/tarped, it will transport the waste to the disposal facility.

Some areas may require a minimal amount of excavation (less than a truck load). These areas will be excavated by backhoe, the material placed in a Sevenson dump truck, and transported to a centrally located stockpile area. All dump trucks will have covers to prevent the spread of contamination. The dump truck will dump its load at the stockpile, will be checked for exterior contamination and, if found clean, returned to the excavation. If a truck becomes contaminated, it will be decontaminated using brushing techniques and pressure washing, as required.

Surface surveying and sampling will be performed to determine if remedial goals have been achieved.

At the completion of excavation and backfilling activities in the Exclusion Zone, Sevenson will remove any sediment tracked into the CRZ and dispose of it as contaminated material.

III. Surface Water Control

Sevenson will install berms, swales, and other measures necessary to prevent surface water from entering and exiting excavations. Surface water will be directed away from excavation and construction sites so as to prevent erosion and undermining of foundations and to prevent surface water run on from becoming contaminated by accumulating in excavations. All diverted water will be directed to existing drain ways and storm sewer systems so as to not flood adjacent structures or properties. Backfill surfaces will be protected to prevent erosion and sloughing. Excavations will be performed so that the site and the surrounding areas at the site will be drained.

Pumping, if required will be conducted in such a manner as to preserve the undisturbed bearing capacity of the sub-grade soils at the excavation. Well or sump installations will be constructed with sand/stone filters to prevent drawing of finer grained soil from the surrounding ground. Pumping will be performed from these sumps/wells.

IV. Existing Utilities

Sevenson will contact the New Jersey One Call System (1-800-272-1000), Public utilities, the Borough of South Plainfield, and other local utility authorities to mark out underground utilities prior to performing any excavation activities. The locations of these lines are approximate on the Contract Drawings and will be field-verified by the utility authorities. Prior to any excavation work, utility clearances will be documented with a completed Field

Safety Checklist. Additionally, Sevenson will perform an electromagnetic or sonic survey at the site to determine the presence of any unidentified utilities.

Sevenson will mark out on-site utilities which are to remain in service, to prevent damaging or disturbing utilities during construction.

All utility lines will be isolated at the street connection by representatives from their respective utility authorities prior to excavation and will be restored upon the completion of work.

Utilities such as telephone poles, water pipes, gas pipes, sewer lines, property survey monuments, and USTs that are encountered during excavation may require temporary structural support. Physical removal of utilities will be coordinated with and performed by local utility authorities, as required.

V. Underground Storage Tanks

If a UST is encountered during excavation, Sevenson will immediately notify the USACE.

USTs determined to be leaking or in poor condition will be removed and disposed of in accordance with an approved Underground Storage Tank Removal and Closure Plan. Heating oil, sediment, and associated piping will be removed from USTs to prevent any accidental releases. Sevenson will obtain a permit from the Local Fire Department for UST removal.

Contaminated underground utilities encountered during excavation will be decontaminated using a steel wire or stiff bristled brush to remove any fixed material from the utility.

Pipelines to be abandoned will have open ends plugged as close as practical to the main supply or distribution line, or as determined by the USACE.

VI. Decontamination of Subsurface Structures

Upon the completion of excavations where basement walls, foundation walls, utilities and other subsurface structures are exposed the structure will be decontaminated prior to backfilling. Sevenson will remove all attached soil material and debris from the structures using trowels, scrapers, wire brushes, vacuuming, or other methods approved by the USACE.

When the contaminated soil has been removed, Sevenson will restore all disturbed wall areas with parging and waterproof coatings, as applicable.

VII. Preparation of Ground Surface for Fill

After contaminated material excavation has been completed, and prior to placement of fill material, the exposed surface of the excavations will be examined to determine the presence of ruts, disturbed ground, wet spots, soft areas, organic matter, or other features undesirable in the sub-grade. Undesirable features will be removed and corrected before placing fill material.

Fill material will be moisture conditioned, as required, to obtain the specified moisture content and density for compaction.

Compaction over underground utilities will be performed by hand tamping techniques.

Geotextile will be placed on the excavated surface as a delineation, prior to backfilling the excavation

VIII. Backfilling

Sevenson will coordinate the delivery of backfill material to limit stockpiling the material. Backfill will not be placed within excavations without the notification or approval of the USACE.

Frozen materials will not be placed in the excavations, nor will clean fill be placed upon frozen material. All such materials will be removed from the excavations prior to backfilling.

Scrap metal, wood, utilities, pipes, concrete, asphalt, or any other deleterious material will not be used as backfill. Excavations will be backfilled utilizing dense graded aggregate (DGA) obtained from an off-site source.

Backfilling will not commence until the excavation has been approved, underground utilities systems have been inspected, tested, and approved, forms removed, and the excavation cleaned of trash and debris.

Backfill will be placed in eight inch (8") loose lifts. Fill material will be spread by a small track bulldozer or utility backhoe. Fill material will be compacted by vibratory drum rollers or double drum walk behind rollers. Heavy equipment will not be used within five feet (5') of an existing structure.

Clean fill material will be backfilled to the lines and grades shown on the Contract Drawings. Backfilling will not commence until excavations have met the remediation goals, all temporary supports have been removed, and approval has been received from the USACE. Backfill will not be placed on snow, ice, standing water, or frozen ground surfaces. Backfill will not be placed when the temperature is below 32° F, unless approval is received from the USCAE.

Controlled Low Strength (CLS) material will be placed within all existing basements, vaults, chambers and for filling all voids arising from demolition or utility removal. The material will be placed to within four feet (4') of finish grade where placement and compaction of previously excavated material is impractical and unsafe.

Prior to compacting, each fill layer will be plowed, tilled, or broken up; moistened or aerated; and thoroughly mixed, to obtain the moisture content for compaction.

Backfill areas determined to be inadequately compacted will be recompacted and retested until the specified criteria have been met.

The following minimum values, expressed as a maximum dry density in accordance with ASTM D 1557, will be used for compaction of clean fill:

	below Optimum Moisture Content (%)
95	± 2.5
	95

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All disturbed areas will be graded to provide a smooth and uniform condition grade. The finished grade will be completed such that drainage patterns will remain unchanged from pre-existing conditions.

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South Plaintield, NJ 07080 Niagara Falls, NY		Magara Falls, N	14000	4303			Check One: This Transmittal is for				
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Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

I. Introduction

The purpose of the Excavation and Materials Handling Plan is to present the methods and procedures for excavation of contaminated soil, procedures for temporary support systems; and methods for backfilling, compacting, and grading. Sevenson will be responsible for obtaining any and all permits necessary for demolition, excavation, removal of Underground Storage Tanks (USTs), operation of a dewatering system, excavation around underground utilities and as otherwise to complete the work in accordance with Federal, State and local regulatory requirements.

II. Excavation

Sevenson will, as a minimum, excavate in the areas and depths of the excavation as indicated on the Contract Drawingsrequired for demolition and removal of slabs, foundations, storage tanks, piping and other buried structures and facilities. The Demolition Design Report indicates foundations are assumed to be four feet below grade. Excavation of material (hazardous and non-hazardous) will occur during the removal of foundations, test pits, and underground utility locating/modifying. Sevenson's licensed land surveyor will provide a tabular site fill balance summary of the total of all excavated soils, contaminated and non-contaminated quantities, and final disposition and location of soils removed from and reused on the site. This summary will be submitted under separate cover.

Excavation of material during the demolition phase of the contract will be kept to a minimum. The amount of open trench will be limited to 200 lineal feet. Only those areas (trenches) designated as being excavated during foundation removal will be performed. Sevenson will minimize the amount of material excavated by visual examination of the foundation during removal. Material will be excavated along the side of the foundation wall to the footing. The width of the footing will then be identified by excavating perpendicular to the foundation wall. The intent is to keep excavation to a minimum.

The material to be excavated will be stockpiled on site sampled in-sitsu for analytical testing and analyzed to determine the proper disposal facility, in accordance with the disposal facilities requirements. If stockpiles are required, stockpile areas will consist of a 40 mil impervious liner placed on asphalt and surrounded with coir wattles to create a bermed area. The liner will be placed over the wattles. Stockpiles will be covered daily with a minimum 6 mil polyethylene liner, secured with sand bags. The cover will extend over the perimeter of the stockpile so that uncontaminated precipitation will run off the pile. Sevenson anticipates testing excavated material at a minimum rate of one sample for every 500 tons or as required

by the disposal facility. Analytical results will be submitted to and reviewed with the USACE prior to shipping the material off-site. Refer to the Sampling and Analysis Plan for specifics. No additional or over excavation of material will be performed unless authorized by the USACE.

Sevenson will not proceed with activities on any other cluster without prior written notification of the USACE.

Test pits will be excavated at predetermined locations as agreed to by the USACE. <u>Typically</u>, a small utility excavator will be utilized during test pit excavation. Excavated material may be sampled and analyzed if the material shows signs of contamination or as directed by the USACE. Hand excavation techniques will be utilized during test pit excavation. Typically, a small utility excavator will also be utilized during test pit excavation.

Soil erosion and sediment control measures will be implemented during excavation activities Refer to Sevenson's Soil Erosion and Sediment Control Plan as approved by the Freehold Soil Conservation District. Measures -include the installation of silt fences, hay bales, coir wattles, and geotextile, as applicable. Dust will be controlled by spraying contaminated material with a water mist, utilizing water obtained from local fire hydrants. A water truck will be utilized to keep dust off of haul roads and as an additional source of water for remote excavation/demolition sites.

Sevenson will protect existing trees, shrubs, facilities, structures, etc., by use of temporary orange safety fencing, flagging, plywood or other means, as required.

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Some areas may require a minimal amount of excavation (less than a truck load). These areas will be excavated by backhoe, the material placed in a Sevenson dump truck, and transported to a centrally located stockpile area. The excavation area will have been previously sampled to determine disposal requirements, regardless of the excavation area size. All dump trucks will have covers to prevent the spread of contamination. The dump truck will dump its load at the stockpile, will be checked for exterior contamination and, if found clean, returned to the excavation. If a truck becomes contaminated, it will be decontaminated using brushing techniques and pressure washing, as required.

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Sevenson will mark out on-site utilities which are to remain in service, to prevent damaging or disturbing utilities during construction.

All utility lines will be isolated at the street connection by representatives from their respective utility authorities prior to excavation and will be restored upon the completion of work.

Utilities such as telephone poles, water pipes, gas pipes, sewer lines, property survey monuments, and USTs that are encountered during excavation may require temporary structural support. Physical removal of utilities will be coordinated with and performed by local utility authorities, as required. Refer to the Above Ground and Underground Storage Tank Removal plans.

V. Underground Storage Tanks

If a UST is encountered during excavation, Sevenson will immediately notify the USACE.

USTs determined to be leaking or in poor condition will be removed and disposed of in accordance with an approved Underground Storage Tank Removal and Closure Plan. Heating oil, sediment, and associated piping will be removed from USTs to prevent any accidental releases. Sevenson will obtain a permit from the Local Fire Department for UST removal.

Contaminated underground utilities encountered during excavation will be decontaminated using a steel wire or stiff bristled brush to remove any fixed material from the utility.

Pipelines to be abandoned will have open ends plugged as close as practical to the main supply or distribution line, or as determined by the USACE.

VI. Decontamination of Subsurface Structures

Upon the completion of excavations where basement walls, foundation walls, utilities and other subsurface structures are exposed the structure will be decontaminated prior to backfilling. Sevenson will remove all attached soil -material and debris from the structures using trowels, scrapers, wire brushes, vacuuming, or other methods approved by the USACE.

When the contaminated soil has been removed, Sevenson will restore all disturbed wall areas with parging and waterproof coatings, as applicable.

VII. Preparation of Ground Surface for Fill

After contaminated material excavation has been completed, and prior to placement of fill material, the exposed surface of the excavations will be examined to determine the presence of ruts, disturbed ground, wet spots, soft areas, organic matter, or other features undesirable in the sub-grade. Undesirable features will be removed and corrected before placing fill material.

Fill material will be moisture conditioned, as required, -to obtain the specified moisture content and density for compaction.

Compaction over underground utilities will be performed by hand tamping techniques.

Geotextile will be placed on the excavated surface as a delineation, prior to backfilling the excavation

VIII. Backfilling

Sevenson will coordinate the delivery of backfill material to limit stockpiling the material. Backfill will not be placed within excavations without the notification or approval of the USACE.

Frozen materials will not be placed in the excavations, nor will clean fill be placed upon frozen material. All such materials will be removed from the excavations prior to backfilling.

Scrap metal, wood, utilities, pipes, concrete, asphalt, or any other deleterious material will not be used as backfill. Excavations will be backfilled utilizing dense graded aggregate (DGA) obtained from an off-site source.

Backfilling will not commence until the excavation has been approved, underground utilities systems have been inspected, tested, and approved, forms- removed, and the excavation cleaned of trash and debris.

Backfill will be placed in eight inch (8") loose lifts. Fill material will be spread by a small track bulldozer or utility backhoe. Fill material will be compacted by vibratory drum rollers or double drum walk behind rollers. Heavy equipment will not be used within five feet (5') of an existing structure.

Clean fill material will be backfilled to the lines and grades shown on the Contract Drawings. Backfilling will not commence until excavations have met the remediation goals, all temporary supports have been removed, and approval has been received from the USACE. Backfill will not be placed on snow, ice, standing water, or frozen ground surfaces. Backfill

will not be placed when the temperature is below 32° F, unless approval is received from the USCAE.

Controlled Low Strength (CLS) material will be placed within all existing basements, vaults, chambers and for filling all voids arising from demolition or utility removal. The material will be placed to within four feet (4') of finish grade where placement and compaction of previously excavated material is impractical and unsafe.

Prior to compacting, each fill layer will be plowed, tilled, or broken up; moistened or aerated; and thoroughly mixed, to obtain the moisture content for compaction.

Backfill areas determined to be inadequately compacted will be recompacted and retested until the specified criteria have been met.

The following minimum values, expressed as a maximum dry density in accordance with ASTM D 1557, will be used for compaction of clean fill:

<u>Location</u>	Dry Density (%)	Percent above or below Optimum Moisture Content (%)
Foundation & Slab removal areas near and under pavements	95	± 2.5

All disturbed areas will be graded to provide a smooth and uniform condition grade. The finished grade will be completed such that drainage patterns will remain unchanged from pre-existing conditions.

T	TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL MANUFACTURER'S CERTIFICATES OF COMPLIANCE				<u>D</u> A	ATE:		TRAN	SMITTAL NO) <u>.</u>
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S	South Plainfield, NJ 07080	Niagara Falls, NY	14305					Check On	e: This Transmittal is	for
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1 copy for 1 copy for 1 copy for	REMARKS: 1 copy for N. Kolb, USACE, Project Field Office, 26 Rustic Mall, Manville, NJ 08835 1 copy for P. Mannino, USEPA Project Manager, Region 2, Project Field Office, 333 Hamilton Blvd, South Plaifield, NJ 07080 C.cSES- File 1 certify that the above submitted items have been reviewed in detail and are correct and in strict conformance with the Contract Drawings and Specifications except as otherwise stated. Specifications except as otherwise stated. William Zambrana, SES NAME AND SIGNATURE OF CONTRACTOR									
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Lead Compliance Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

LEAD AWARENESS PROGRAM

1. Introduction

 When lead is present at the work site, lead awareness training will be provided for all affected project personnel prior to the initiation of onsite tasks.

2. General

Symbol: Pb

 Characteristics: Lead is a heavy, ductile metal with a bluish white color.

3. Training

The lead awareness program provides information to site personnel regarding the potential exposure to lead, the associated health effects, the personal protective equipment required, and work practice controls.

4. Health Hazards

Lead can be absorbed into the body by inhalation (breathing) and ingestion (eating). Exposure to lead is usually in the form of dust and fumes. Absorption of inorganic lead through the skin does not take place to any appreciable degree. Therefore, this exposure route does not represent a significant pathway for exposure. Only a few lead compounds are appreciably soluble in water, but many are dissolved by acids and most are sufficiently soluble in body fluids to be toxic, especially when inhaled in finely divided form.

Permissible Exposure Level: 0.05 mg/m3

Threshold Limit Value: 0.05 mg/m3

5. Health Effects

The early stages and symptoms of lead poisoning are nonspecific and may resemble many diseases including influenza.

Early signs and symptoms are:

- Malaise, fatigue
- Sleep disturbance
- Constipation
- Abdominal cramps
- Hemolytic Anemia, (red blood cells being destroyed)
- Irritability
- Aching muscles and bones
- Headache
- Decreased appetite
- Nausea and vomiting

These symptoms are reversible, and complete recovery is possible.

In more advanced cases of lead poisoning, the above signs and symptoms progress and frequently involve the gastrointestinal and neuromuscular (both nerves and muscles) systems.

Central nervous system symptoms are:

• Brain dysfunction (encephalopathy) which may mimic bacterial meningitis.

Symptoms include:

- Fever
- Headache
- Stiff Neck
- Vomiting
- Personality changes
- Tremor

- Hallucinations
- Intellectual deterioration
- Accumulation of cerebrospinal fluid within the brain (hydrocephalus)
- Blindness may occur from optical atrophy (wasting away of the optic nerves secondary to lead exposure and convulsions)

Gastrointestinal symptoms are:

- Colon spasms
- Nausea, vomiting
- Loss of appetite
- Constipation

Signs and symptoms associated with the blood and blood generating tissues are:

- Anemia, in which the red blood cells have a reduced hemoglobin content
- Increased serum iron

The bone marrow reveals increased production of nucleated red corpuscles (erythroblasts) and also structural (morphological) changes such as:

- Basophilic stippling
- Deformed nuclei

The iron content of the marrow is increased, and increases in siderocytes, sideroblasts and reticuloendothelial cells are noted. Some investigators believe the basic effect lead has on the marrow is first hyperstimulation followed by delayed maturation.

Kidney (renal) symptoms are:

- An abnormal amount of uric acid in the blood (hyperuricemia)
- Inflammation (nephritis)
- The presence of glucose in the urine (glycosuria)
- An abnormal amount of amino acids in the urine (hyperaminoaciduria)
- Progressive increase in blood urea.

Additional signs and symptoms which may be present are:

- A black or purplish line on a gum margin
- Skin pallor
- Loss of weight
- Weakness of extensor muscles (such as a wrist or foot drop)

Cortical atrophy (reduction in size of brain tissue) has also been described but this in not a common finding.

6. Medical Program

If on-site personnel are exposed to lead levels greater than 0.03 mg/m³, a biological monitoring program will be instituted in accordance with Sevenson's Medical Monitoring Program. Biological monitoring will involve the collection of blood lead samples every six months with results reported to Sevenson's Health and Safety Officer and the exposed individual. Exposure levels will be determined by performing personal sampling during on-site tasks.

7. Respirators

Respiratory protection will be required of all personnel engaged in activities with the potential for lead exposure. Respirators will provide protection against the inhalation of airborne dust potentially contaminated with lead as well as organic lead in the form of tetraethyl lead.

8. Clothing

On-site personnel will be required to use dermal protection as listed in the Site Specific Safety and Health Plan.

9. Hygiene and Sanitation Practices

At no time will food, drinks, tobacco products, chewing gum, etc. be stored in exclusion zones or contamination reduction zones. Eating, drinking, or smoking will only be permitted in designated areas. Onsite personnel must wash their hands and face prior to doing any of the aforementioned activities.

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Pest and Rodent Control Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

December 5, 2006

Revision 1

PEST & RODENT CONTROL PLAN

I. PLAN OBJECTIVES

The purpose of the Pest and Rodent Control Plan is to present the methods and procedures required to prevent infestation of construction or storage areas. Sevenson will be responsible for completing the work in accordance with Federal, State and local regulatory requirements.

II Methods

Sevenson will obtain the services for a professional exterminator / rodent control expert who will visit the site to prepare work plans and/or location plans where bait stations/ traps will be employed.

Sevenson intends to hire the following professional service to perform pest control:

The Terminix International Company L.P. 209 North Center Drive North Brunswick, NJ 08902 Telephone Number: 732-940-2436

Terminix will coordinated the baiting locations with the South Plainfield building department and obtain any permits required for this work.

Terminix's rodent control expert will visit the site a minimum of twice weekly through out the demolition of buildings/structures. MSDS sheets of the materials to be utilized for bait will be provided by Terminix and kept with the Site Health and Safety Officer.

Sevenson anticipates that Terminix will install baiting locations about the perimeter of the demolition site and at buildings adjacent to the demolition site to prevent infestation of these areas and other storage areas on the site. The rodent control expert will inspect these areas during demolition activities to determine if the control measures are working.

Sevenson's superintendent/management will provide written documentation of Terminix's visits and work performed to the USACE on a weekly basis.

The USACE will be notified at least 24 hours in advance of site visits by Terminix.

At the conclusion of demolition, all bait and traps will be removed from the site.

PEST & RODENT CONTROL PLAN

III Baiting Plan

A site plan showing the locations of the baiting stations will be prepared after the initial visit by the pest control professional. The plan will be discussed with the South Plainfield Building department prior initiating pest control procedures.

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Neal F. Kolb, Alt., Contracting Officer Representative

ENG FORM 4025, March 95 (ER 415-1-10) EDITION OF Sept 93 IS OBSOLETE

INCLOSURES RETURNED (List by Item No.)

SHEET 1 OF 1

DATE

Site Security Plan for Hazmat Materials and Transportation

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006

SEVENSON ENVIRONMENTAL SERVICES, INC.

Site Security Plan for Hazmat Materials and Transportation

Master Revision 1.3 Effective Date: 07/21/06

Site-SpecificInformation

Site Name: Cornell-Dubilier Electronics Superfund Site

Site Specific Version: 1.0 Site Effective Date: 12/1/06 Address: South Plainfield, NJ Client: USACE/EPA Region 2 Site Telephone: 908-769-5301

1.0 Statement of Purpose

This Security Plan has been developed pursuant to 49 CFR 172, Hazardous Materials: Security Requirements for Offerors and Transporters of Hazardous Materials as promulgated in 68 FR 14509. The U.S. Transportation Security Administration has reported that international terrorist groups are interested in obtaining hazardous materials, through both legal and illegal means, for use as weapons against both civilian and military targets.

Sevenson Environmental Services, Inc. is committed to the safety and security of our employees, clients, and the general public. Sevenson is aware of the inherent risk of materials generated at its client's sites and recognizes that it must be vigilant to prevent the use of any of its equipment or client's materials for transport by a terrorist threat.

Sevenson has established a Company Policy that all employees take the risk of terrorist attack seriously, and make every effort, on a daily basis, to ensure that all hazardous materials and shipments are controlled and secure until they reach there final destination.

The following written Security Plan is that Company Policy. All Sevenson Hazmat employees (and Hazmat employees of subcontractors) as defined in 49 CFR 172 will be trained to be familiar with the content and implementation of this Security Plan. Compliance with Sevenson's Security Plan will henceforth be a condition of continued employment with the Company.

2.0 Sevenson Environmental Services Security Objectives

- Respond to significant threats and vulnerabilities identified in the company's risk assessment:
- Assure that Human Resources conducts an initial screening of all applicants and Company personnel;

- Provide training for all Hazmat employees in general terrorism awareness and Company security procedures;
- Assure the safety and security of the Company's personnel, equipment, client's materials, and the general public;
- Deter theft of property;
- Comply with all applicable federal, state, and local regulations;
- Respond to changes in the security environment according to the Homeland Security Advisory System (HSAS)

3.0 Sevenson Security Organization

Security is the responsibility of each Company Hazmat employee. Training provided by the Company on a need-to-know basis, based on employee position and duties, will assist each employee to remain knowledgeable in and compliant with site and transportation security policies and procedures. All employees are responsible for reporting daily observations of actual, or potential, breaches of security to their immediate supervisor. Discussions of security issues will be added to the daily "tailgate" Health and Safety meetings currently conducted with all Hazmat employees at a site. This forum will be utilized for the following:

- To inform employees of revisions or changes to Company Security Policy;
- To facilitate continuing training throughout the year;
- To remind employees to maintain a state of vigilance; and
- To encourage contributions and suggestions to assist management in improving security planning.

Management will actively monitor and evaluate the performance of this Security Plan. As necessary, the Security Plan will be revised to assure continuing compliance with its stated objectives and regulatory changes.

The policies and procedures of this Security Plan are effective as of the date shown above.

The following Table describes the Company's security structure and the responsibilities of Company personnel.

NAME	POSITION	RESPONSIBILITIES	CONTACT INFORMATION
Laurence Elia *	Vice President	 Final approval of Security Plan and all revisions Approves changes in internal company threat alert levels Oversees crisis team 	Office: (800) 777- 3836

Kenneth Paisley *	Technical Services Manager/Security	•	Prepares and maintains site Security Plan	Office: (800) 777- 3836
	Manager	•	Prepares site-specific risk assessment and changes to the Security Plan	Fax: (716) 285- 4201
		•	Reviews reports of security breaches	Mobile: (716) 609-1466
		•	Maintains liaison with law enforcement and emergency response	
		•	authorities Ensures internal compliance with	
			Security Plan Implements and directs	
			site-specific extra precautions to higher risks and threats and in	
		1	emergency situations Directs Crisis Team Coordinates crisis	
		1	response with subcontractors	
			Maintains security sensitive information	
			Coordinates compliance by Human Resources Manager regarding personnel security	
			provisions	
Kim Lickfield	Site Project Manager		Supervises implementation of Security Plan at the Site	Site: 908-769- 5301
			level	Mobile: 716-998-
		•	Monitors employee	4542
		•	performance Verifies security	
		lt .	compliance through	
			daily "tailgate" Health	
			and safety meetings	
		ł	Reviews and submits written reports of site	
		l	security breaches to the	
			Security Manager	
		l	Assures Human Resource files at site	
		l	are properly	
			documented, updated	

		 and maintained Assures that Company records and communications are appropriately secured 	
Dr. Paul Hitcho *	Director, Health and Safety	 Coordinates with site Health and Safety Officers managing "tailgate" meetings Manages public health and containment issues during crisis response 	Office: (800) 777- 3836
Jim Agustinak	Company Fleet Dispatch Manager	Monitors movement and communications with Company-owned (non-subcontract) vehicles Assures en route security of Company-owned vehicles Assures written report of security breaches en route of Company-owned vehicles are reported to Security Manager	Office: (800) 777-3836
TBD	Site CQCS Manager/Transportation Coordinator	 Coordinates day-to-day transportation scheduling Assures field compliance with Security Plan Coordinates with subcontracted Site Security Guards to assess security concerns and to maintain authorized personnel site access lists Coordinates Site access authorization for non-Sevenson, non-Client, or non-subcontractor personnel Reports directly to Site Project Manager regarding security issues 	Site: 908-769- 5301

Gary Bean	Contracted Security Guards	 Monitors Site security and persons accessing Site Maintains Site Visitors log Detains unauthorized persons Reports security breaches to law enforcement and CQCS Manager 	Site: 973-242- 5400
Joyce Oswald	Human Resources Manager	Conducts security check of all current or potential employees to include: confirmation of legal status to work in USA; obtaining copy of drivers license with legal name; check of employment history by request	Office: (800) 777- 3836
TBD	Site Technicians/Operators/ Laborers	 Maintain awareness of Company Security Plan and site security Observe vehicles for signs of tampering Observe work area for unauthorized access of suspicious activity Report suspicious activity to supervisor 	
TBD	Subcontractor Personnel	 Comply with Sevenson Security Plan as directed while onsite Comply with their company's Security Plan, as required Observe vehicles for signs of tampering Observe work area for unauthorized access or suspicious activity Report suspicious activity to Sevenson 	

^{*} Functions as member of Crisis Team in security situations to organize and coordinate Sevenson response.

4.0 Risk Assessment

Sevenson has assessed the potential vulnerabilities of the Site and its operations in light the current threats of terrorism with respect to the nature of materials generated and transported from the Site, the Location of the Site itself, its proximity to residential and populated areas, and current regulatory requirements.

Sevenson has determined that based upon 49 CFR 172, Subpart I, a potentially significant security threat does exist requiring implementation of a Site-specific version of the Company's Master Security Plan. In enacting a Site-specific Security Plan, Sevenson will assure that all Company Hazmat employees are made aware of communication and other security issues as defined in this Plan as appropriate to their job duties. In determining the presence of a threat and the need for a Security Plan, the following general assessments were made:

<u>Hazardous Material</u>	Present at or Transported from Site
DOT Class 7 Radioactive Material	Not Applicable
>25 kg (55 lbs) of DOT Division 1.1, 1.2, or 1.3 Explosive Materials	Not Applicable
> 1 L (1.06 qt) DOT Poisonous by Inhalation Material as defined in 171.8 that meets the criteria for Hazard Zone A	Not Applicable
DOT Hazardous Materials in bulk packaging with a capacity of $\geq 13,248$ L (3500 gallons) of liquid or gas or ≥ 13.24 m ³ (463 ft ³) for solids	Not Applicable
Non-bulk packaging of ≥2,268 kg (5000 lbs) of Hazardous Material for which placarding is required	Not Applicable
Select agent or toxin regulated by the Centers for Disease Control and Prevention	Not Applicable
Hazardous Material requiring placarding Under 49 CFR 172, Subpart F	Potentially Applicable

Sevenson has determined that Site operations managing the above identified hazardous materials exhibit a potential vulnerability and risk to attack or exposure through the following scenarios: **Theft of Equipment and Cargo, Hijacking, and Sabotage**.

5.0 Personnel Security

Sevesnon Personnel

Site Hazmat personnel possessing a Commercial Drivers License are confirmed in accordance with the Federal Motor Carrier Safety Requirements are considered to satisfy the requirements of 49 CFR 172, Subpart I. All other Site Hazmat personnel will be subject to a background check to be conducted by the Human Resources Manager. This check will include: confirmation of legal status to work in USA; obtaining copy of drivers license with legal name; and, check of employment history by request of the Project Manager.

Client Personnel

Sevenson will confirm with the Client that any Client-employed Hazmat personnel meet, at a minimum, Sevenson's background check criteria. Written record of compliance with these criteria will be maintained by the Project Manager in the Project records.

Subcontractor Personnel

Subcontractor Hazmat personnel possessing a Commercial Drivers License are confirmed in accordance with the Federal Motor Carrier Safety Requirements are considered to satisfy the requirements of 49 CFR 172, Subpart I. All other subcontractor Hazmat personnel will be confirmed as meeting a minimum background check to include: confirmation of legal status to work in USA; and, a copy of driver's license with legal name on file with subcontractor. Written record of compliance with these criteria will be maintained by the Project Manager in the Project records.

6.0 Facility Security

General Facility Security Practices

Sevenson will maintain and enforce a restricted visitation policy and prohibit unauthorized persons from accessing the Site at all times. A Site visitor's log will be maintained at the guard trailer. Authorized visitors will be allowed access outside of office trailers only when accompanied by the CQCS Manager or his designee. Field supervisors and subcontracted security personnel will be instructed to approach and question any unauthorized and/or unfamiliar persons observed loitering or acting in a suspicious manner within Site boundaries. This will also apply to authorized persons or employees who are not scheduled to be onsite.

Security Practices During Preparation for Shipment of Placarded Waste

The following Facility Security measures will apply whenever placarded materials are being prepared for transport:

• Loading will only occur between the hours of 7:00 am and 5:00 pm, or while adequate daylight permits unobstructed vision of loading operations

- Only trucks bearing identification markings (i.e. EPA ID number, hazardous
 waste permit numbers, and subcontractor company logos) from previously
 approved transport subcontractors will be loaded; non-compliant vehicles will be
 detained while the Transportation Coordinator or CQCS Manager confirm trucks
 identity
- First-time drivers of subcontracted transport vehicles will be briefed in compliance with this Security Plan
- Drivers will only proceed to areas designated for loading and staging at the Site
- Drivers will be required to remain with their vehicles unless a request is made to the Transportation Coordinator
- If vehicle is left unattended onsite by the driver, it will be locked
- No unscheduled vehicles will be allowed access to the loading area
- Blank waste manifests and load delivery paperwork will be kept in a secure limited access area
- Copies of daily signed manifests retained at the Site will be checked against that days schedule of loads

7.0 En Route Security

Once placarded materials have been loaded, and each load has been checked and confirmed as secure and ready for transport, Sevenson will release the load under the manifest system to its site-approved transportation subcontractor. Sevenson will continue to coordinate with all subcontracted transporters while each vehicle is en route until confirmation of delivery (via either a facility-signed manifest or telephone communication) is received.

While en route, each subcontractor's driver will operate and maintain his manifested load of material per that company's Security Plan. Copies of each site-approved transporter's Security Plans will be maintained at the Site by the CQCS manager. Each individual driver will be responsible for load security under his particular Security Plan; however, the following general procedures will be stressed:

- Confirm that CDL, medical cards, and subcontractor ID information is current and available should law enforcement officials stop the vehicle en route
- Driver should conduct pre- and post-delivery inspections of his vehicle when ever his vehicle is stopped that include a "walk-around" to confirm the continued integrity of the load and that unauthorized access or tampering has not occurred
- Drivers will use site-designated routes when entering or leaving the Site
- Drivers may use alternate delivery routes to designated disposal facilities; however, drivers will use designated routes, if such routes are specified
- Drivers nay avoid high population centers when possible
- Minimize stops en route
- If stops are made, select locations that are well-lighted, along well-traveled routes, that avoid high-crime areas
- Anytime a Hazmat driver leaves sight of his vehicle, that vehicle must have the keys removed from the ignition with the windows rolled up and all doors locked
- Avoid tunnels and bridges where possible

- At no time may drivers pick up hitchhikers or allow any unauthorized persons in their vehicles
- If driver must alter his pre-planned route or delivery schedule, he must immediately contact his fleet dispatcher; significant delays due to unforeseen circumstances (e.g. traffic delays, weather conditions, etc.) must likewise be communicated with the dispatcher
- Driver will made scheduled calls to communicate with his dispatcher while en route
- Hazmat drivers should not talk to unknown or unauthorized persons regarding delivery schedules, routes or destinations; any suspicious interest by unauthorized persons will be immediately reported to his dispatcher and/or the Sevenson CQCS Manager
- Drivers should be alert to any suspicious activities while en route such as roadside distractions, occupants of other vehicles trying to distract or contact him or erratic operations of other vehicles near his truck; all such suspicions should be immediately reported to his dispatcher

8.0 Communications

Onsite

The CQCS Manager and Transportation Coordinator will be responsible for maintaining communications with all subcontractors. This will include arrangements for scheduling loads, changes to previously scheduled load-outs, changes to approved routes, notification of en route incidents, and receipt by designated disposal facilities.

The CQCS Manager will also be responsible for overseeing general Site security and notifying the Project manager and/or Security Manager of actual or potential security issues. He will coordinate ongoing Site security awareness follow ups during daily Health and Safety meetings.

Offsite

Offsite communications by subcontractor personnel will be as specified in their particular company Security Plan. It is the responsibility of the subcontractor and its employees to know, understand and comply with the requirements of their Plans as they apply to their job duties. Sevenson will maintain communication with designated representatives of each subcontractor to coordinate or offer assistance in the implementation of the subcontractor Plan.

9.0 Records Security

The master copy of this Security Plan will be maintained at Sevenson's corporate office by the Security Manager. The site-specific version will be maintained at the Site by the CQCS Manager. All copies of the full Security Plan will be considered restricted sensitive security information that may only be reviewed or distributed on a need-to-know basis. The Security Manager and Project Manager will make initial determinations as the extent of the Plan's dissemination. On-going review or access of the Plan by WARNING: This record contains Sensitive Security Information that is controlled under 49 CFR parts 15 and 1520. No

part of this record may be disclosed to persons without a "need to know", as defined in 49 CFR parts 15 and 1520, except with the written permission of the Administrator of the Transportation Security Administration or the Secretary of Transportation. Unauthorized release may result in civil penalty or other action. For U.S. government agencies, public disclosure is governed by 5 U.S.C. 552 and 49 CFR parts 15 and 1520.

additional individuals will not occur without written request by the Project Manager or CQCS Manager to the Security Manager.

Sevenson's Master Security Plan will be maintained and updated by the Security Manager as required. Each update will be issued a Version Control Number and will be subject to Crisis Team review and approval.

This site-specific Security Plan will remain in effect until the Site Contract is closed. After Contract closure, this document will be retained in archive with all Project documents.

10.0 Training

All Sevenson Hazmat employees, as defined in 49 CFR 171.8, will be provided security awareness and in-depth security plan training in accordance with 49 CFR 172.704.

Security Awareness training will provide all Company employees the awareness that Sevenson has a Security Plan in place and the ability to recognize suspicious or possible terrorist behavior or incidents and the means of communicating and reporting this information. Additional training in specific aspects of security planning and implementation of the Security Plan itself will be given to individuals based upon their job responsibilities and functions.

Each Hazmat employee will receive initial training within 90 days of employment per 49 or transfer CFR 172.704(c) and recurrent (at least once every three years) training and 49 172.704(c)(2) in conjunction with annual Health and Safety recertification. Documents of employee training will be maintained in each Health and Safety training file.

11.0 Verification

Sevenson will schedule periodic verification reviews and inspections to assure compliance with this Security Plan. The Security Manager, Project manager, or CQCS Manager will be responsible for conducting all reviews. Results, observations and recommendations of verification reviews will be will be recorded with daily Construction Quality Management Reports prepared for the Site, a copy of which will be forwarded to the Security Manager.

12.0 Revisions to the Security Plan

Sevenson will review the security records and performance of Site operations annually to determine if revisions to the Plan are needed. For each significant breach of security, the Security Manager will make a determination if any interim modifications are required. The Crisis Team will serve as a review committee for modifications to the Plan. Each approved modification will be issued a new Version Number and will become effective after approval and signature of the Company President and Security Manager.

Copies of the Plan as specific and applicable to individual Company Sites and operations will be circulated to employees on a need-to-know basis after its effective date. The

Master Copy of the Plan at the Company office and site-specific Plans at Site locations must display complete approvals as indicated below.

13.0 Approvals

Master Plan Version: 1.3 Site-specific Location: Cornell-Dubilier Electronics

Superfund Site

Plainfield, New Jersey

Effective Date: 12/01/06 Ve

Laurence Elia

Vice President

Signature

Date

Kenneth Paisley

Security Manager

Signature

Date

Kim Lickfield

Project Manager

Signature

Date

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1 Trailer's Floor Plan 3 1.2 A	
REMARKS: I certify that the above submitted items have been reviewed in deta are correct and in strict conformance with the Contract Drawings at Specifications except as otherwise stated.	
1 copy for E. Urbanik, USACE N. Resident Office, NY District, 214 State Highway 18 N, E. Brunswick, NJ 08816 1 copy for P. Mannino, USEPA Project Manager, Region 2, Project Field Office, 333 Hamilton Blvd, South Plaifield, NJ 07080 William Zambrana, SES	
c.cSES- File NAME AND SIGNATURE OF CONTRACTOR	
Section II APPROVAL ACTION	
INCLOSURES RETURNED (List by Item No.) NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY DATE	
Neal F. Kolb, Alt., Contracting Officer Representative	
ENG FORM 4025, March 95 (ER 415-1-10) EDITION OF Sept 93 IS OBSOLETE SHEET 1 OF	1

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Trailer's Floor Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

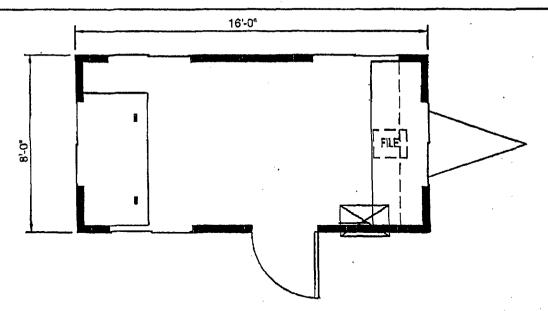
U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 13, 2006



Specifications

Size(s)

- 20' Long (including hitch)
- 16' Box size
- 8' Wide
- 7' Ceiling height

Interior Pinish

- Paneled walls
- · Vinyi tile floors
- Gypsum Ceiling
- Wide open shells available

Purniture

- One built-in plan table
- Overbead shelf

Electric

- Fluorescent ceiling lights
- Breaker panel

Windows/Door

- Horizontal slider windows
- Vision panel door with standard lock

Heating and Cooling

- Electric baseboard heat
- Thru-wall AC unit

Exterior Finish/Frame

- Aluminum siding
- I-Beam frame
- Standard drip rail gutters

Additional floor plans available. Floor plans and specifications may vary from those shown, and are subject to in-stock availability.



Mobile Offices · Storage Products
· And More

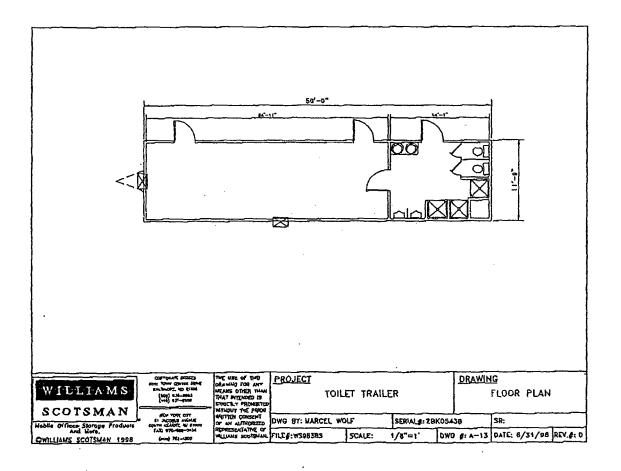
Mobile Office 20x8

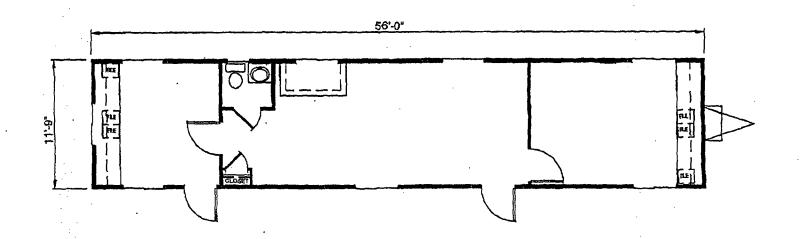
WILLIAMS SCOTSMAN, INC.

170 Central Avenue South Kearny, NJ 07032

Phone: 973-589-1234
Pax: 973-589-3434

Toll free: 800-782-1500





Specifications

Size

- 60' Long (including hitch)
- 56' Box size
- 12'Wide
- 8' Ceiling height

Interior Fintsh

- Paneled walls
- Vinyl tile floors
- Gypsum celling
- Private office(s)
- Wide open shells available

Farniture

- Two built-in desks with file cabinets
- One built-in plan table
- Overhead shelf

Electric

- Fluorescent ceiling lights
- Breaker panel

Windows/Doors

- Hortzontal slider windows
- Two vision panel doors with standard locks

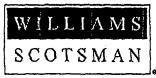
Heating and Cooling

Central HVAC or thru-wall AC

Exterior Finish/Frame

- Aluminum siding
- 1-Beam frame
- Standard drip rail gutters

Additional floor plans available. Floor plans and specifications may vary from those shown, and are subject to in-stock availability.



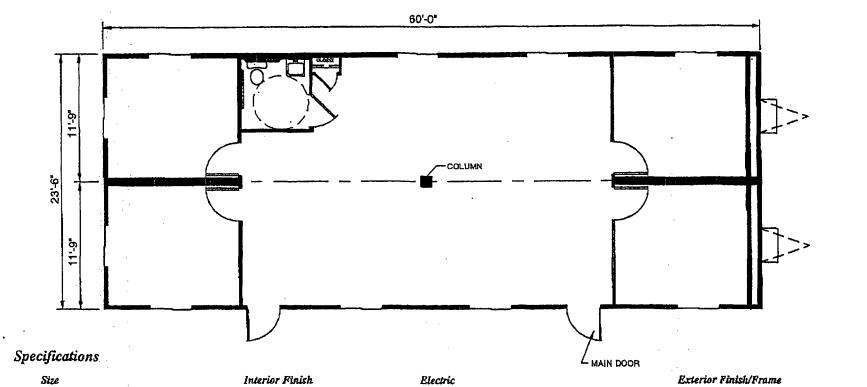
Mobile Offices · Storage Products And More

Mobile Office 60x12

WILLIAMS SCOTSMAN, INC.

170 Central Avenue South Kearny, NJ 07032 Phone: 973-589-1234

Fax: 973-589-3434 Toll free: 800-782-1500



- 64' Long (including hitch)
- 60' Box size
- 24' Wide
- 8' Ceiling height
- Other double wide sizes are available
- Paneled walls
- Vinyi tile floors
- Gypsum ceiling
- Private office(s)
- Wide open shells available
- Fluorescent ceiling lights
- 110/240 volt single phase electric
- Two 100 AMP breaker boxes

Windows/Doors

- · Horizontal slider windows
- Two vision panel doors with standard locks
- Aluminum siding
- I-Beam frame or perimeter frame
- Standard drip call gutters

Additional floor plans available. Floor plans and specifications may vary from those shown and are subject to in-stock availability.



Mobile Offices · Storage Products
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Section Modular 64x24

WILLIAMS SCOTSMAN, INC.

170 Central Avenue South Kearny, NJ 07032 Phone: 973-589-1234

Fax: 973-589-3434
Toll free: 800-782-1500

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Waste Management, Transportation, and Disposal Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 17, 2006

WASTE MANAGEMENT, TRANSPORTATION, AND DISPOSAL PLAN

CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE SOUTH PLAINFIELD, NEW JERSEY

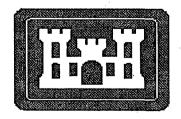
CLUSTER 12

November 2006 CONTRACT NO. W912DQ-06-D-0006

Prepared By:



Prepared for:



U.S. ARMY CORPS OF ENGINEERS KANSAS CITY DISTRICT OFFICE

WASTE MANAGEMENT, TRANSPORTATION AND DISPOSAL PLAN

CORNELL-DUBILIER SUPERFUND SITE SOUTH PLAINFIELD, NEW JERSEY

CLUSTER 12

Kim Lickfield Date

Sevenson Project Manager

Al LaGreca Sevenson Program Manager

Kenneth Paisley
Sevenson Technical Manager

Date

USACE Project Manager

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, NY 14305

November, 2006

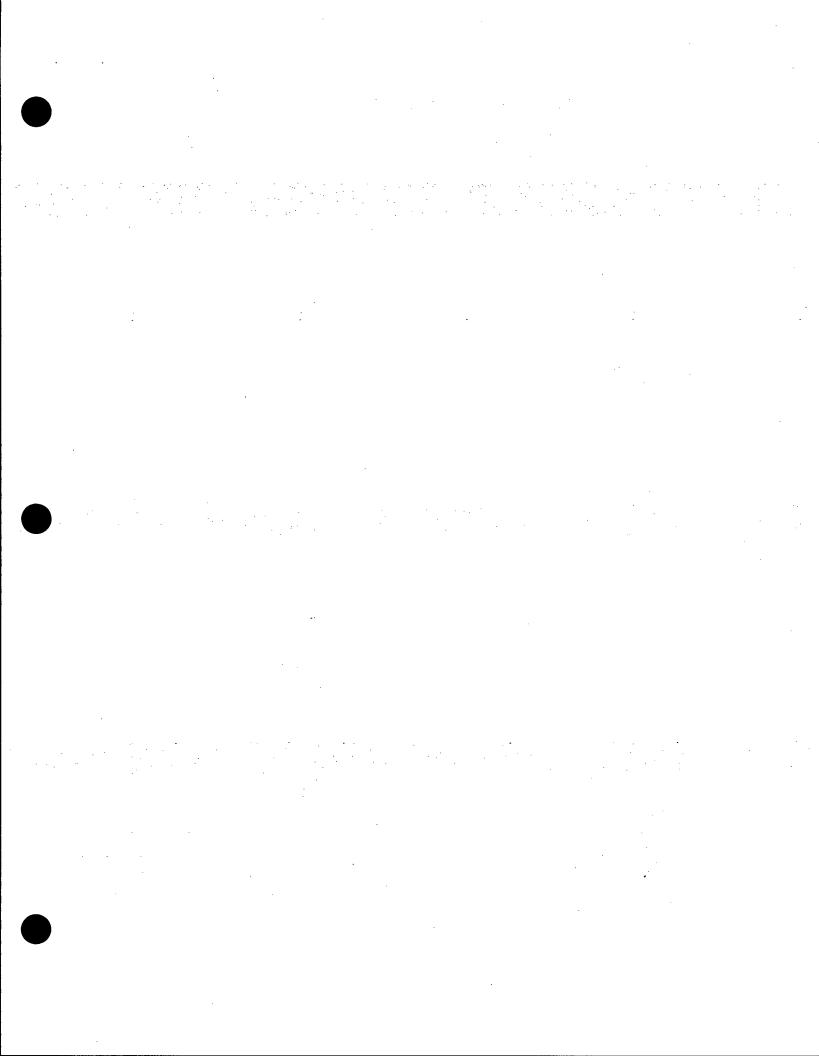


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	Transportation Boutes

LIST OF ACRONYMS

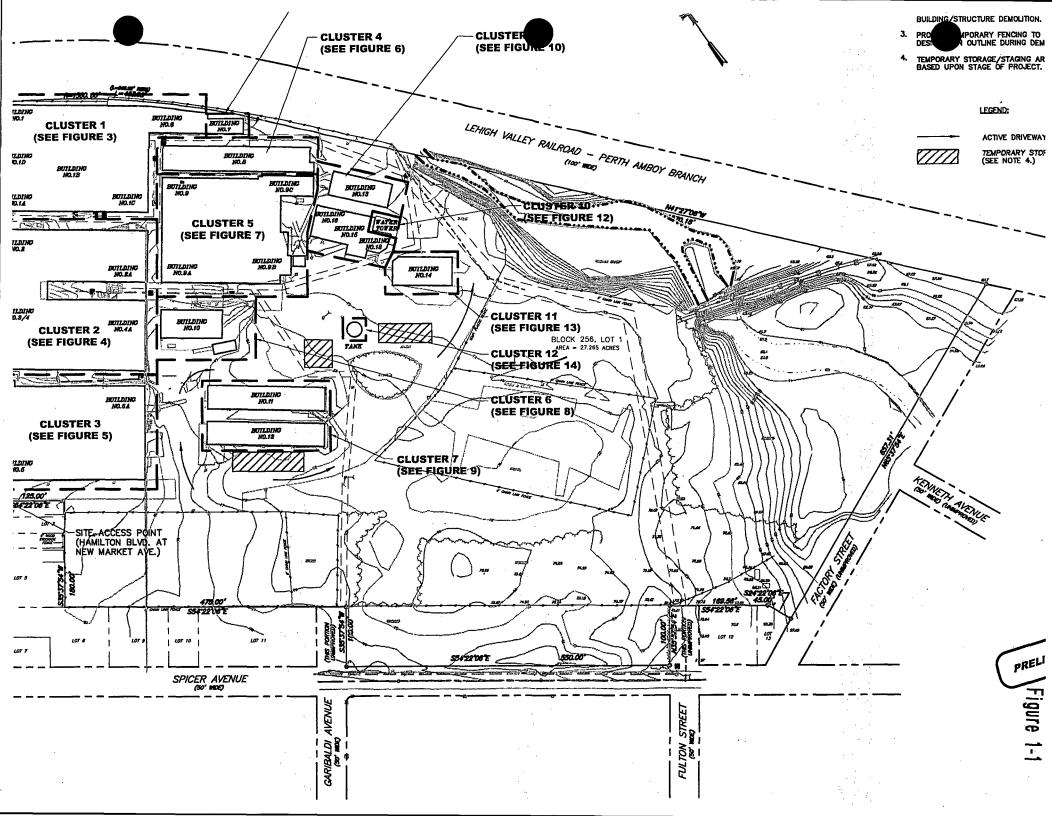
ARAR	Applicable, Relevant and Appropriate Regulations
CFR	. Code of Federal Regulations
DO	. Delivery Order
IDW	Investigation Derived Waste
PPM	. Part Per Million
PPE	. Personal Protective Equipment
	. Polychlorinated Biphenyls
PRAC	. Pre-placed Remedial Action Contract
RCRA	. Resource Conservation and Recovery Act
SAP	. Sampling and Analysis Plan
Sevenson	. Sevenson Environmental Services, Inc.
	. Toxic Substance Control Act
	. Unites States Army Corps of Engineers
	. United States Department of Transportation
	. Volatile Organic Compound
WMT&DP	. Waste Management, Transportation and Disposal Plan

1 INTRODUCTION

The United States Army Corps of Engineers (USACE) Kansas City District has been designated to remediate the contaminated buildings and soils located at the Cornell Dubilier Electronics Superfund Site (the Site), located in South Plainfiled, New Jersey. Sevenson Environmental Services, Inc. (Sevenson), under its Pre-placed Remedial Action Contract (PRAC) No. W912DQ-04-D-0023, has been designated the Remedial Action Contractor for the Site. The primary objective of the remediation effort is the timely and effective cleanup of the Site in accordance with the U.S. Army Corps of Engineers Contract Delivery Order (DO) 0005 issued October 17, 2006, for the Site. This DO provides for the demolition and off-site disposal of materials from within the area designated as Cluster 12.

The remedial activities to be performed at the Cluster 12 (see Figure 1-1) area of the Site will result in the generation of various types of demolition materials and remediation wastes. This Waste Management, Transportation and Disposal Plan (WMT&DP) identifies the procedures and guidelines that will govern material and waste handling operations during the remedial action activities.

Specifically, the WMT&DP describes the classifications of materials and wastes that are anticipated to result from remedial activities; the regulatory requirements for management of such materials and wastes; the procedures to be followed during the remedial action activities for material and waste management, transportation, and disposal; and the applicable notification, documentation, and reporting requirements associated with the material and waste management activities. As additional DO's are issued for the Site, this WMT&D Plan will be updated as necessary.



2 MATERIAL AND WASTE SOURCES AND CLASSIFICATIONS

This section describes the sources and classifications of the materials and wastes that may be generated during the remedial activities to be performed at the Site.

2.1 SOURCES OF MATERIALS AND WASTES

Implementation of the remedial action activities at the Site will result in the generation of materials and wastes which will require appropriate on-site and off-site management. These materials and wastes will be generated during demolition and removal of Site structures, as well as during the execution of associated support operations (i.e., equipment decontamination, etc.). The anticipated materials and wastes to be generated from the implementation of the remedial action activities include, but are not limited to:

Source

Potential Materials and Wastes

Structure Demolition Activities

- Construction Debris (both contaminated and non-contaminated)
- · Contaminated Soil directly associated with removal activities
- Water from Excavation Areas and Surface Run-off
- Spent Personal Protective Equipment (PPE), Debris, Disposable Equipment and Sampling Debris

Decontamination Activities

- Contaminated Sediments and Residues
- Decontamination Waters
- Spent PPE, Debris, Disposable Equipment

Other

- Common trash and garbage (non-contaminated)
- Sanitary Wastewater
- Waste Oil (from filters, equipment maintenance)

2.2 MATERIAL AND WASTE CLASSIFICATIONS

Previous Site investigations and samplings have been conducted under separate contracts. These investigations have identified areas of concern within Site Areas (designated by Cluster Numbers) and contaminants of concern that may include heavy metals, volatile organic compounds (VOC) and polychlorinated biphenyls (PCB). Identification of the various potential classifications of waste materials for offsite disposal purposes is presented in subsequent sections. A matrix of potential disposal classifications and designated disposal facilities is included in Section 2.2.6.

Implementation of the remedial action activities at the Site will involve handling waste materials that are not subject to the Resource Conservation and Recovery Act (RCRA) hazardous waste or Toxic Substance Control Act (TSCA) regulations. A solid waste may be a RCRA hazardous waste if it is specifically listed as a RCRA Hazardous Waste, or if it exhibits any of the following characteristics of hazardous waste: ignitability, corrosivity, reactivity, and/or toxicity. The regulatory definitions for each of these characteristics are contained in 40 Code of Federal Regulations (CFR) Part 261.21 through 261.24. A solid waste may be a TSCA waste if it contains PCB at concentration of greater than 50 parts per million (ppm). The regulatory definitions for each of these characteristics are contained in 40 CFR Part 761. Any wastes identified as being either RCRA Listed or Characteristic Hazardous Wastes, or as TSCA regulated, must be managed in accordance with all applicable RCRA and/or TSCA hazardous waste management regulations.

Additional characterization sampling will be conducted based on previous analytical results and the types and volumes of materials generated for disposal to determine if they exceed regulatory limits for management as a hazardous waste. This sampling is discussed in the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover.

2.2.2 RCRA Hazardous Debris and Soils

It is not anticipated that any listed wastes are present at the Site. Therefore, for the purposes of this plan, discussion will be limited to RCRA Characteristic Hazardous Wastes.

Characteristic Hazardous Materials and Waste

RCRA characteristic hazardous wastes are materials that exhibit ignitability (Hazardous Waste Code D001), corrosivity (Hazardous Waste Code D002), reactivity (Hazardous Waste Code D003), and/or one or more of the toxicity characteristics (Hazardous Waste Codes D004 through D043). The hazardous waste characteristics are identified through laboratory analysis of waste materials or based on the waste generator's knowledge of the process generating the waste. Review of data from the Site indicates that elevated levels of heavy metals or VOCs may be present in Site wastes. Materials encountered during the remedial action activities will be sampled and analyzed to determine if they are RCRA Characteristic Hazardous Wastes.

Spent PPE, equipment, and materials that are contaminated with RCRA Hazardous Waste may themselves be classified as RCRA Hazardous Wastes based on the "Derived From" Rule. If RCRA Hazardous Wastes are identified at the Site, spent PPE generated during the removal and handling of these materials will be segregated from the other PPE and disposed along with the RCRA hazardous waste itself.

RCRA hazardous wastes will be disposed of at a RCRA hazardous (Subtitle C) permitted dispsal facility.

2.2.3 PCB (TSCA) Hazardous Debris and Soils

Site debris or soils which exhibit levels of PCB contamination at greater than 50 ppm will be managed as a TSCA regulated waste for offsite disposal purposes. Review of data from the Site indicates that elevated levels of PCB may be present in Site wastes. Materials encountered during the remedial action activities may be sampled and analyzed to determine if they are TSCA regulated hazardous wastes.

TSCA hazardous wastes will be disposed of at a TSCA hazardous (Subtitle C) permitted disposal facility.

2.2.4 RCRA/TSCA Mixed Debris and Soil

Site debris or soils which are sampled and determined to exceed RCRA characteristic hazardous waste criteria and contain PCB at TSCA regulated levels of greater than 50 ppm will be managed as RCRA/TSCA mixed waste.

RCRA hazardous wastes will be disposed of at a RCAR/TSCA hazardous (Subtitle C) permitted disposal facility

2.2.5 Other Materials and Wastes

In addition to the waste classification identified above, remedial action activities may also result in the generation of waste materials that are not classified as RCRA or TSCA hazardous wastes but may contain hazardous substances requiring special management procedures (Regulated Wastes). Such Regulated Wastes may include the following:

- <u>Non-Hazardous Wastewaters</u> Wastewaters generated during project activities may contain contaminants that will be stored in temporary storage tanks onsite. Each tank of water will be sampled to determine possible hazardous waste classification prior to offsite disposal.
- <u>Trash and Rubbish</u> This material includes spent packaging materials, equipment, and general garbage and trash that has not been impacted by contaminated materials at the Site. Trash and rubbish will be stored on-site in appropriate containers and will be disposed of at a licensed off-site municipal waste facility. This material will be transported by a licensed local municipal waste hauler.

2.2.6 Waste Classification and Offsite Disposal Matrix

A summary of anticipated disposal facilities, by Contract Bid Item Number and Disposal Classification, is as follows:

Bid Item	Disposal Classification	Disposal Facility Type	Disposal Facility Location
0005	Below-grade construction and debris (C&D)	Non-hazardous landfill	Pioneer Crossing Landfill . Birdsboro, PA
0007A	TSCA > 500 ppm. PCB	TSCA direct landfill.	Waste Management Model City, NY
0007B	TSCA < 500 ppm PCB	TSCA direct landfill	Waste Management Model City, NY
0007C	RGRA (TGLP.Pb)	RCRA stabilization treatment then landfill disposal	EQ Belleville, MI
0007D	TSCA/RCRA (> 500 ppm PCB/TCLP Pb)	Macroencapsulation	Waste Management Model City, NY
0007E	TSCA/RCRA (< 500 ppm PGB/TCLP Pb)	TSCA/RCRA stabilization treatment, then landfill disposal	Waste Management Model City, NY

A8000	TSCA > 500 ppm PCB	TSCA direct landfill	Waste Management Model City, NY
0008B	TSCA < 500 ppm PCB	TSCA direct landfill	Waste Management Model City, NY
0008C	RCRA (TCLP Pb)	RCRA stabilization treatment, then landfill disposal	EQ Belleville, MI;
0008D	TSGA/RCRA (> 500 ppm PGB/TGLP Pb)		Clean Harbors; Inc. Grassy Mountain, UT
0008E	TSCA/RCRA (< 500 ppm PCB/TGLP Pb)		Waste Management Model City, NY

3 REGULATORY REQUIREMENTS

Materials and wastes generated during the remedial action activities at the Site will be managed in accordance with the applicable local, State, and Federal regulations for each particular classification. In addition, all waste management activities will be performed in a manner that is protective of human health, safety, and the environment. The following sections describe the regulatory requirements for the wastes identified in Section 2 of this WMT&DP.

The anticipated transporters are:

RCRA/TSCA Hazardous Transporters

Transporter: US Bulk Transport, Inc. US EPA ID Number: PAD 987347515 Facility Location: Fairview, Pa

Name of Responsible Contact: Craig Goodelle

Telephone Number: (800) 642-8910

Unit of Measure for Costing Purposes: Per Ton

Transporter: Page ETC, Inc.

US EPA ID Number: NYD 986969947 Facility Location: Beachwood, NJ

Name of Responsible Contact: Mark Gleason

Telephone Number: (732) 240-7990

Unit of Measure for Costing Purposes: Per Ton

Non-RCRA/TSCA Hazardous Transporters

Transporter: J&D Trucking, Inc. US EPA ID Number: NJD 000029967

Facility Location: Vineland, NJ

Name of Responsible Contact: Joe Manis Telephone Number: (856) 691-5145

Unit of Measure for Costing Purposes: Per Load

Transporter: Environmental Transport Group, Inc.

US EPA ID Number: NJ0 000692061

Facility Location: Flanders, NJ

Name of Responsible Contact: Rob Collioud

Telephone Number: (800) 598-3844

Unit of Measure for Costing Purposes: Per Load

The anticipated offsite disposal facilities are:

Non-RCRA/TSCA Hazardous Disposal Facility

Facility Name: Pioneer Crossing Landfill Pennsylvania ID Number: Permit No. 100346

Facility Location: Birdsboro, PA

Name of Responsible Contact: Tom O'Connor

Telephone Number: (610)-582-1900

Unit of Measure for Costing Purposes: Per ton

RCRA/TSCA Hazardous Disposal Facilities

Facility Name: Waste Management, Inc./Model City Landfill

US EPA ID Number: NYD 002114759

Facility Location: Model City, NY

Name of Responsible Contact: Pat Ludwig Telephone Number: (716) 754-8231

Unit of Measure for Costing Purposes: Per ton

Facility Name: The Environmental Quality Company

US EPA ID Number: MID 000724831

Facility Location: Belleville, Mi

Name of Responsible Contact: Mara Klien Telephone Number: (800) 592-5489

Unit of Measure for Costing Purposes: Per ton

Facility Name: Clean Harbors, Inc US EPA ID Number: UTD 991301748 Facility Location: Grassy Mountain, Ut

Name of Responsible Contact: Chris Vidovich

Telephone Number: (724) 223-7704

Unit of Measure for Costing Purposes: Per ton

3.1 NON-RCRA DEBRIS AND SOILS

On-Site Management Requirements

Management of non-RCRA or TSCA hazardous demolition debris and soils involves removal of designated structures and associated soils from the Cluster Areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

If needed, stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 02310 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of solids' material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of non-RCRA hazardous materials.

Off-Site Transportation Requirements

Non-hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept non-RCRA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle D disposal facility approved by the USACE listed in Section 2.5.6.

Off-Site Processing & Disposal Requirements

No offsite processing of Site debris and waste materials is anticipated. Each load of waste shipped will be accepted under the waste approval acceptance application (Non-hazardous Waste Certification Form) submitted to the disposal facility. All loads of waste will be managed by the landfill per their permit requirements by direct dumping and landfill.

3.2 RCRA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

Management of RCRA hazardous demolition debris and soils involves removal of designated structures and associated soils from the Cluster Areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 02310 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminants.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of RCRA hazardous materials.

Off-Site Transportation Requirements

RCRA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept RCRA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the USACE listed in Section 2.5.6.

Off-Site Processing & Disposal Requirements

RCRA hazardous debris and soils (assumed hazardous for TCLP lead) will be treated under Land Disposal Restriction regulations per 40 CFR 268.40 by the landfill by stabilization prior to final disposal. Each load of waste shipped will be accepted under the waste approval acceptance application (Waste Profile Form) submitted to the disposal facility.

3.3 TSCA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

Management of TSCA hazardous demolition debris and soils involves removal of designated structures and associated soils from the Cluster Areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 02310 of the

Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminated material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of TSCA hazardous materials.

Off-Site Transportation Requirements

TSCA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept TSCA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the USACE listed in Section 2.5.6. All loads will be manifested with net payload weights in kilograms per 40 CFR 761.207.

Off-Site Processing & Disposal Requirements

TSCA hazardous debris and soils (PCB > 50 ppm) will be directly landfilled by the disposal facility. Each load of waste shipped will be accepted under the waste approval acceptance application (Waste Profile Form) submitted to the disposal facility.

3.4 RCRA/TSCA HAZARDOUS DEBRIS AND SOILS

On-Site Management Requirements

Management of RCRA/TSCA hazardous (assuming hazardous for TCLP lead with greater than 50 ppm PCB) demolition debris and soils involves removal of designated structures and associated soils from the Cluster Areas of the Site. Structures and soils have been previously tested, and additional samples for waste characterization purposes will be obtained per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. Wastes will either be transported to the on-site stockpile area or loaded directly into trucks for shipment off-site to the chosen disposal facility.

Stockpiles will be covered with six mil polyethylene in a way to suppress dusting or blowing and to allow water runoff without contaminating the runoff water. Stockpiles will be kept to a minimum, typically under one hundred cubic yards and be constructed as specified in Contract Specification Section 02310 of the Specifications. Soil erosion control measures including silt fence, sand bags, etc. will be installed around stockpiles to prevent the migration of contaminated material.

All material management activities will be performed in accordance with applicable local, State and Federal regulations for handling, labeling, and storage of RCRA and TSCA hazardous materials.

Off-Site Transportation Requirements

RCRA/TSCA hazardous debris and waste material must be disposed of at a facility licensed/permitted to accept both RCRA and TSCA hazardous materials. For the Site, it is anticipated that contaminated soils will be transported to a licensed/permitted Subtitle C disposal facility approved by the USACE listed in Section 2.5.6. All loads will be manifested with net payload weights in kilograms per 40 CFR 761.207.

Off-Site Processing & Disposal Requirements

RCRA hazardous (TCLP Lead) hazardous and TSCA regulated debris and soils (with 50 ppm<PCB < 500 ppm) will be stabilized for the lead component and landfilled by the disposal facility. RCRA hazardous (TCLP Lead) hazardous and TSCA regulated debris (with > 500 ppm PCB) will be

macroencapsulated and landfilled by the disposal facility. RCRA hazardous (TCLP Lead) hazardous and TSCA regulated soils (with > 500 ppm PCB) will be stabilized for lead content and landfilled by the disposal facility. Each load of waste shipped will be accepted under the waste approval acceptance application (Waste Profile Form) submitted to the disposal facility.

3.5 OTHER MATERIALS AND WASTES

Wastes other than soils that are contaminated, but non-RCRA hazardous, and non-regulated will be handled and stored on-site in a manner that prevents releases to the surrounding environment and that will not interfere with on-site activities.

Disposal Options

The disposal options available for the various non-regulated wastes that may be encountered during performance of the work are presented below:

- Trash and Rubbish Trash and rubbish will be hauled by a local, licensed hauler to an appropriate municipal or industrial waste facility.
- Waters All waters generated during remedial activities will be temporarily stored onsite prior to characterization for offsite transport and disposal.
- Used oils Used oils will be stored onsite prior to transport offsite for recycling.

4 MATERIAL AND WASTE MANAGEMENT PROCEDURES

This section presents the specific guidelines and procedures that will be followed for the management of material and wastes handled during the remedial action activities at the Site. These procedures are generally applicable to the management of wastes after they have been removed/excavated. Specific procedures for material and waste excavation and removal are presented in the Site Operations Work Plan, submitted under separate cover. The procedures presented in this section are based on the project goals of minimizing threats to Site workers, human health, and the environment during all material and waste handling activities. Specific procedures and guidelines for handling, staging, storing, sampling, packaging, labeling, and transporting material and waste are presented in the following sections.

4.1 GENERAL

Material and waste handling activities will be performed in a manner that minimizes the threat of a release of potentially contaminated material to the environment and surrounding community, and protects worker health and safety. Care will be taken during operations and activities that will generate materials and wastes, such as demolition and excavation, to prevent releases of material, waste, and dust to the surrounding environment. All waste management disposal options are included in Section 2 of this WMT&D Plan.

4.2 MATERIAL AND WASTE HANDLING PRECAUTIONARY MEASURES

The following procedures may be implemented prior to or during remedial activities to ensure that there are no releases of material and/or waste to the environment and surrounding community, and to protect Site workers.

- Engineering controls such as water sprays may be used during activities that could potentially generate dust (i.e., demolition and loading) to prevent the spread of contaminants via wind dispersion.
- Plastic sheeting may be placed under and around containers while they are being loaded. Any
 material that falls onto the plastic sheeting during loading will be collected and placed in the
 container.
- Site workers will wear PPE appropriate for the specific task being performed, in accordance with the Site Health and Safety Plan, submitted under separate cover. Spent PPE and contaminated disposable equipment and materials will be containerized and disposed of appropriately.
- Equipment used during construction activities in potentially contaminated areas will be properly decontaminated before moving through clean areas of the Site or leaving the Site.
- A "clean road" will be established to allow material and waste hauling vehicles to enter and exit
 the Site without coming into contact with contaminated media. This will prevent contaminated
 debris, soils or sediments from being "tracked" onto the public roadways. Vehicles will undergo
 decontamination (brooming, brushing or washing), as necessary, based on a visual screening
 process.

4.3 PRE-EXCAVATION SCREENING

Pre-demolition and excavation screening of materials will be conducted per the SAP. Demolition and excavation limits in each Cluster are based upon the Site Drawings and footprints of contamination provided by USACE.

4.4 MATERIAL AND WASTE HANDLING, STAGING, AND STORAGE

The procedures and guidelines that will be used for handling, staging, and storage of waste materials generated during the remedial activities at the Site are presented below.

As demolition waste is generated or contaminated soils are excavated, they will be loaded into hauling vehicles for direct transport to the offsite landfill or transferred to the appropriate designated staging area or material preparation area (materials containing free liquid only) for further management. The Site Operations Work Plan identifies the locations of the designated staging areas within the exclusion zone.

Materials transported for offsite disposal must not contain any free liquids and must pass the paint filter test. Therefore, any materials that are saturated upon removal or excavation may be transferred to a designated temporary material preparation area prior to transfer to the loading area. The material preparation area will be equipped with a sump to allow for collection of waters. These waters will be transferred to the on-site holding tank for disposal and/or reuse. Sumps at the material preparation area and staging areas will be cleaned out, as necessary, to remove accumulated sediments. Cleaning of the sediment traps will be performed using hand tools and heavy equipment, as appropriate. Sediments removed from the sump will be solidified, as necessary, and disposed of along with soils.

All trucks, excluding those dedicated to the demolition or excavation areas of the site, will remain on the "contaminant-free" haul road within the Exclusion Zone. All vehicles leaving the Exclusion Zone will be visually inspected, and, if leaving the Site property, decontaminated prior to release per the Site Operations Plan.

All below-grade grubbed material (i.e. tree roots or piping) removed during excavation will be managed with the soils. The excavator will shake tree root masses or piping as they are removed to dislodge clumps of soil. To the greatest extent possible, all subsurface debris will be directly loaded into disposal transport vehicles with associated debris or soils. If necessary, large/oversize debris will be pulled to the side of the excavation prior to loading. As required, physical sizing of debris will be performed by Sevenson personnel before loading. Oversize concrete may also be removed to the stockpile area for further size reduction or removal of rebar or mesh. Debris will be sized to approximately 24 to 36 inch diameter size to meet landfill requirements.

In addition to Site soils and debris, all Investigation Derived Waste (IDW) and PPE, including discarded disposable Health and Safety sampling equipment and plastic sheeting, will be consolidated on a daily basis at the decontamination pad area at the Site. IDW/PPE will be placed in plastic bags on a daily basis prior to weekly consolidation into (55) gallon drums for storage. Once offsite transportation of waste commences, the (55) gallon drums will be emptied into loads of waste being shipped for disposal.

Besides IDW and PPE generated during project activities, other components (i.e. tools, brooms, etc.), debris or refuse might be generated by contact with contaminated soils. These secondary wastes will be disposed of along with Site soils. Planning, management and housekeeping practices will be employed that minimizes generation of secondary wastes. These management and housekeeping practices will include:

- Determine which tools or materials must be taken into designated contaminated areas and limit as practical.
- Identify and maintain designated tools or materials for use in contaminated areas.
- Prevent excessive amounts of materials (i.e. bags, rags, etc.) from entering designated areas.
- Segregate and maintain contaminated materials from non-contaminated sources.
- Reuse contaminated materials within designated areas, as possible.
- Separate compactable from non-compactable contaminated materials.

4.5 MATERIAL AND WASTE SAMPLING AND ANALYSIS

Sample analysis results for Full RCRA characterization analysis from the samples obtained by Sevenson during area characterization activities will be submitted to the disposal facility along with a completed waste profile to obtain disposal approval. The detailed procedures for sampling excavated materials are presented in the SAP, submitted under separate cover.

Qualifications and experience of Site personnel are provided in the Site Operations Work Plan. Laboratory operations project organization and personnel responsibilities are provided in the laboratory's Quality Assurance Project Plan which can be made available for review by request.

4.6 MATERIAL AND WASTE PACKAGING

All material and waste scheduled for off-site transportation and disposal will be properly packaged in accordance with all applicable local, State and Federal regulations, including USDOT Hazardous Materials Regulations contained in 49 CFR Parts 171 through 180. Materials scheduled for shipment will be packaged in either end dump or tri-axle dump trailers.

The following minimum packaging requirements apply for materials to be shipped:

Bulk Packaging

- Bulk packaging (i.e. dump or tri-axle trailers) must, at a minimum, meet the applicable requirements contained in 49 CFR 173.24, General Requirements for Packaging and Packages.
- Bulk packaging must be covered. The top must be completely enclosed with no opening along the sides or openings in the top.
- Bulk packaging must be prepared to prevent material from leaking out or water from leaking in.
 Shipments containing free water will not be accepted by the disposal facility.
- Bulk packaging must be clean. It must not have any waste materials, or other material which could be mistaken for waste material, on the outer surface.
- Each bulk container which requires marking will be properly marked in accordance with 49 CFR 172 Subpart D.

4.7 MATERIAL AND WASTE LABELING AND DATING

Material and waste containers and packages will be marked in accordance with applicable local, State and Federal requirements (49 CFR 172 Subpart D). In addition, a unique identification number will be assigned to each load of waste for disposal to allow for proper tracking of the material from the time of shipment through off-site disposal and receipt of a certificate of disposal (if applicable). This information will be recorded by on-site personnel on a Material and Waste Disposal Tracking Log (See Appendix A).

NOTIFICATIONS, DOCUMENTATION, AND REPORTING

The following sections present the procedures to be used for notifications, documentation, and reporting activities associated with management of excavated material during the remedial activities.

5.1 NOTIFICATIONS

Notifications of material and waste management activities at the Site will be made in accordance with the requirements of applicable local, State, and Federal requirements. In particular, notification of Off-Site Policy Certification per 40 CFR 300.440 will be made.

In the unlikely event that an incident occurs during transport, the Waste Transportation and Disposal Coordinator will notify the appropriate USACE representative as well as the required entities, as defined by USDOT requirements. The type of information that may be provided includes:

- Location and name of person making report.
- Name and address of carrier represented by person making the report.
- Telephone number where person can be reached.
- Date, time, and location of the hazardous materials incident.
- Extent of injuries, if any.
- Classification of materials involved.
- Type of incident and nature of hazardous materials, if any, involved.
- Whether or not a continuing danger to life exists.

5.2 DOCUMENTATION PROCEDURES

Various types of documentation will be required for material management activities associated with the remedial activities to be performed at the Site. Field activities that generate material and waste will be documented to ensure that material and waste are managed appropriately. Material and waste characterization activities will be documented to ensure that material and waste characterization data can be easily and clearly correlated to a particular Site area. Material and waste management activities will be closely documented to ensure that all materials and wastes are properly handled and disposed of.

5.2.1 Documentation of Field Activities

Field activities, if any, that generate material and waste will be properly documented in order to establish the origins of such material and waste for proper disposal. The party who containerizes the material or waste is responsible for the initial documentation associated with generation of material or waste. At a minimum, the following information will be recorded when material or waste is generated and containerized:

- The date of generation.
- A description of the material or waste.
- Any pertinent observations about the material or waste.
- The approximate quantity of material or waste.
- The type of storage container used for the material or waste.
- Where the material or waste shall be staged while awaiting characterization and disposal.

The containers and/or stockpiles used for on-site storage of material or waste will be appropriately dated and labeled to assist in proper tracking of material or waste. All stockpiling will be conducted in such a manner as to limit the possibility of the co-mingling of different waste types or hazardous waste classifications.

5.2.2 Documentation During Transportation and Disposal

Transportation and disposal activities will be documented using the Material and Waste Disposal Tracking Log presented as Appendix A to this plan. The information recorded on this log, when applicable, may include:

- The load identification number for the material/waste.
- The material/waste disposal approval number.
- The quantity of the material/waste.
- The facility to which the material/waste was sent.
- The manifest number (if required) for shipment off-site.
- The date the material/waste was shipped.
- The date on which it was received at the facility.
- The date a certificate of acceptance or disposal was received from the facility (if applicable).

5.3 On-Site Spill Response Plan

All transportation subcontractors will have spill response contingency plans for handling spills ranging from small incidental releases to large releases caused by overturns (See Section 9.3). Sevenson personnel will handle small releases onsite. Large releases caused by full overturns on-site will be handled by teams of the transporter's in-house response crews supplemented by Sevenson or additional subcontractors as required. Manpower, equipment and materials are handled on a case-by-case basis.

6.1 DOT-Required Placards

All transport vehicles operating within the Site perimeter that do not travel public access roadway will not require D.O.T. placarding.

All DOT, TSCA and/or RCRA regulated materials shipped from the Site to the appropriate disposal facility will be transported in properly placarded, permitted vehicles. The following is a list, by waste type, of D.O.T. shipping name, hazard class, and placard requirements:

Waste Type	D.O.T. Shipping Name	Hazard Class	Hazard Number
RCRA Hazardous	RQ, Hazardous Waste Solid,	. 9	NA 3077
(D008)	n.o.s. (D008)		
TSCA Hazardous	RQ, Polychlorinated Biphenyls,	9	UN 2315
(PCB > 50 ppm)	Solid		
RCRA/TŠCA	RQ, Hazardous Waste Solid,	9	NA 3077
(D008) (PCB)	n.o.s.		
Hazardous			
Non-Hazardous Debris	Non-D.O.T. Regulated Material	None	None
and Soil	(Site Debris)		

A total of four placards will be placed on each vehicle, with one placard affixed in a place that is clearly visible on each side and on each end of the dump box of the vehicle. The position, durability, color, size and type of the placard will comply with all requirements set forth by 49 CFR Section 172.504, 172.508, 172.516, 172.519, 172.331, and 172.332.

Office Waste and Sanitary Facility Waste from the Site are not considered D.O.T., TSCA or RCRA hazardous. They will be transported by truck for disposal by the appropriate municipal or private entity or subcontractor for offsite management. No D.O.T. placarding of this material shall be required.

6.2 Example of Placards

The above referenced placard will be vinyl and measure 10.75" x 10.75" and be imprinted with the numbers 3077 or 2315. An example of a placard is included in Appendix F of this plan. If during the completion of the Cluster, or future Cluster Areas, additional designation placards are required, this plan will be amended to included examples of each.

MODE AND ROUTE OF TRANSPORTATION

This section describes the procedures for transportation and disposal of material and waste during remedial activities.

Sevenson personnel and the designated onsite Transportation Coordinator will manage all aspects of transportation for disposal for all waste at the Site. This will include the scheduling, staging, directing from various Site locations, issuance of required paperwork, and final inspection prior to exit from the Site. Further detail and explanation of transport activities is found in the Traffic Control and Transportation Plan, submitted under separate cover.

A log of all truckloads will be maintained on site. This log, as a minimum, will contain the date shipped, truck number/license plate number, weight, manifest number, truck tare weight, and any other pertinent information pertaining to a particular shipment.

The transportation subcontractor will be responsible for en-route tracking and management of waste shipments. A daily summary of truck delivery logs will be provided to Sevenson by the transportation subcontractor. Sevenson will coordinate with the transportation subcontractors to assure adequate numbers of trucks are scheduled daily to meet contract completion schedules.

The designated Transportation Coordinator for this project is Kenneth Paisley, of Sevenson. Mr. Paisley's resume is included in Appendix C of this Plan.

7.1 Type of Transporter

Hazardous bulk solid wastes will be loaded directly into polypropylene-lined aluminum-bodied end dump trailers for transport to the appropriate disposal facility as referenced in Section 2.0 of this Plan. Non-hazardous loads will not require a lined transport vehicle.

Municipal (Office) wastes will be consolidated into a commercial dumpster that will be staged at the Site. The contracted municipal waste hauler will empty the container into a bulk transfer trailer.

Sanitary waste will be removed from Site Port-A-Johns by the contracted septic waste service. Each Port-A-John unit will be emptied with a vacuum tanker.

7.2. Transport Vehicle Capacity

The bulk solid dump trailers will measure approximately 40' long (outside dimensions), 8' wide (outside dimensions) and 7' high. Each dump trailer will hold approximately 40 cubic yards or between 22-25 tons of material.

Municipal and sanitary contractors will supply adequate equipment to perform removal of their designated wastes.

7.3. Anticipated Shipment Frequency

Empty dump trailers for bulk solids will be loaded from outside the temporary storage pad or demolition exclusion zone areas. All full trailers will be immediately tarped to prevent the infiltration of precipitation and any possible drying/dusting problems. All loading and removal will be performed

precipitation and any possible drying/dusting problems. All loading and removal will be performed between the hours of 7:00 am and 5:00 pm, subject to change by request of USACE and approval by the USEPA. Sevenson will coordinate with the transportations subcontractors to provide sufficient vehicles to maintain the project schedule.

The project schedule and the proposed demolition plan may require the shipment of waste to multiple disposal facilities on any given workday. Sevenson will coordinate closely with each facility's designated representative and/or on-site transportation coordinator. A color-coded demolition and excavation site diagram will be prepared based upon the previous determinations of waste types from the contract drawings and results of additional site sampling, as required. A review of the past days' removal, and the current days anticipated production will be conducted with field supervisors and operators at the morning tailgate meeting. A daily verification of completed and proposed scheduling of excavation will be made with the onsite transportation coordinator, each disposal facility, and the anticipated transporters of waste. Records pertaining to all daily demolition and/or excavation activities and contacts with various subcontractors will be maintained in the Daily Quality Control Reports for the Site.

Office waste will be collected in appropriate containers (dumpsters) onsite and picked up on a weekly basis by a municipal waste contractor.

Sanitary wastes will be collected on a minimum weekly basis, or more frequently as required, by the septic disposal contractor in septic waste vacuum tanker.

7.4 Transportation Routes

The disposal transport vehicles will be called to the site on an as required basis. The trucks will approach the Site via I-287, taking either the Dunham Avenue exit (eastbound) or the Stelton Road exit (westbound). After exiting, the trucks will turn onto Hamilton Boulevard and enter the Site at 333 Hamilton Boulevard. The trucks will then be directed by Sevenson personnel to the loading location.

Once loaded, the vehicles will proceed to the Site scale for weighing. Once weighed, the truck will proceed to the tarping station for final preparation. After tarping, the exterior of the truck/trailer will be decontaminated, as necessary, on the decontamination pad. After receiving final notification from the onsite Transportation Coordinator, the trucks will then exit the gate and proceed on a reverse route to I-287. The trucks will then proceed to the appropriate disposal facility by the specified routes included in Appendix G.

All municipal solid waste and sanitary waste transport vehicles will also utilize these routes to enter and leave the Site.

7.5 Temporary Off-Site Storage

All transport vehicles will travel directly to their intended disposal facility. No offsite temporary storage of Site materials is anticipated. Should mechanical failure or driver injury necessitate the unscheduled storage of materials once the vehicle is en route, the appropriate parties will immediately notify Sevenson. Sevenson will make the USACE aware of any transport irregularities and will coordinate with USACE to resolve any difficulties.

If possible, the vehicle should be returned to the Site or removed to the transporter's own secure facility or service yard until alternate arrangements can be made. If this is not possible, another facility's secured yard or lot will be desirable.

7.6 Weight and Size Limitations

The bulk solid dump trailers and their associated transport vehicle furnished by the transporters will have a legal over-the-road weight capacity of 80,000 pounds gross weight. Each tractor and trailer combination will vary slightly in payload capacity, so the driver of the vehicle will be consulted prior to exiting the Site to confirm payload appropriateness.

All other types of transport vehicles will be subject to limitations according to their manufacturer's requirements. All hauling weights will be confirmed with the driver and their respective dispatcher prior to the first removal of a particular waste from the Site.

7.7 Vehicle Licensing and Registration Requirements

All vehicles will be licensed and permitted in all states through which they may travel. The onsite Transportation Coordinator will confirm all permitting issues with the dispatcher of the trucking company. Copies of all permits and licenses will be made available onsite upon request by USACE.

8.1 Summary and Examples of Completed Shipping Papers

The required shipping papers for each shipment of RCRA, TSCA or RCRA/TSCA regulated hazardous waste from the Site will consist of an Hazardous Waste Manifest, Land ban Disposal Restriction (LDR) Form, and, if required by the transportation company, a truckers' bill of lading.

One set of forms will be provided for each load. When ready to exit the Site, the truck driver will be presented with the completed paperwork. He will sign the manifest, as directed, and carry the manifest, LDR, and bill of lading (as required), in his cab at all times until he arrives at the disposal facility.

All other Non-hazardous solid wastes will be shipped with the shipping documentation (bill of lading, receipt ticket, etc.) supplied by the appropriate subcontractor.

Copies of example shipping documents can be found in Appendix E of this Plan.

9.0 TRANSPORTATION QA PROGRAM

9.1 Truck Inspection Criteria and Corrective Action Procedures

9.1.1 Truck Integrity

All truck/transportation vehicle tires should be inspected immediately upon arrival at Site by the designated Transportation Coordinator and/or Sevenson's Project Manager for punctures, cracks, or protrusions. The interior of each trailer will be inspected for holes, protrusions, or debris. A check for current and required permit decals on each cab or trailer will be performed.

It is the responsibility of the appropriate transportation subcontractor to deliver well-maintained, usable transport vehicles to the Site and the responsibility of Sevenson to determine if the vehicle is fit to carry the specific waste. If the vehicle is not acceptable to Sevenson, the subcontractor shall be notified immediately that the vehicle has been rejected and arrangements shall be made for replacement.

9.2 Lining and Tarping Procedures

All bulk solid hazardous waste transport vehicles will be lined with a 6 mil polyethylene liner. The liners will have sufficient end flaps and side flaps which extend over the edges of the box to protect from contamination. Once loaded, the flaps will be folded into the center of the waste to partially cover the load.

The tarps (top covers) are made of 9 mil woven polypropylene fabric and measure approximately 10' wide x 24' long. The tarps will be secured using braided rope through 16 tie-down hooks.

Although not anticipated, liners for non-hazardous trucks may be used at the discretion of the disposal facility and Sevenson. All non-hazardous loads will be securely tarped, however, before leaving the Site.

9.3 Spill Response Contingency Plan

All transportation subcontractors will have spill response contingency plans for handling spills ranging from small incidental releases to large releases caused by overturns. Large releases caused by full overturns or offsite incidents will be handled by teams of the transporter's in-house response crews supplemented by subcontractors as required. Manpower, equipment and materials are handled on a case-by-case basis. Any subcontractor will notify Sevenson in the event that any spillage occurs during transit to its appropriate designation facility. Each truck transporter is required to maintain and follow a Spill Contingency Plan. Notification by the truckers of any incidents shall be made to Sevenson. In turn, Sevenson will notify all appropriate individuals associated with this project of any spill and the response actions being taken. Copies of the transporter's Spill Contingency Plan are included in Appendix D.

APPENDIX A MATERIAL AND WASTE DISPOSAL TRACKING LOG

Waste Track	ing Log				-							
					* 10 miles							
Job # Project Name	esta rataria a gist	Japan Allinko (j. 183		u india manga				Revised Date				
	Market Control											COD
oad lo. Ship To	Transporter	Date Shipped	Time Slot	Profile	Transport P.O.#	(if any) hrs	Manifest Number	Man, Doc. #	Est Net Weight	Actual Weight KG	Actual Tons	Rec'd
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APPENDIX B
FACILTY ACCEPTANCE LETTER

PENDING

APPENDIX C
TRANSPORTATION COORDINATOR RESUME

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Kenneth O. Paisley

Job Title:

Technical Manager

Education:

B.S., Biology, Bloomsburg University, 1988

Years Experience: 17 years

Special Qualifications:

Certified Hazardous Materials Manager (CHMM), Master Level (Certificate #7961)

USACE Wetland Delineation and Management Training (Certificate #2279)

40-hour and 8-hour OSHA Hazardous Waste Site Training per 29 CFR 1910.120

Radiation Worker I and II Certification

Cargo Security Awareness/Planning Training per 49 CFR 172.704(a)

HM-181/POPS Training / DOT Training Certification per 49 CFR 172 Subpart H

US Army Corps of Engineers Construction Quality Management Certification

Member, Air and Waste Management Association Member

Academy of Certified Hazardous Materials Managers, President Western New York Chapter

Summary of Specific Experience and Qualifications

Sixteen years working experience in regulations associated with Hazardous, Toxic, and Radioactive Waste (HTRW) investigations, compliance, studies, designs and remediations.

Multi-task oriented and capable to allow management and input to numerous company project sites simultaneously.

Familiar with regulations and the permitting and operation of waste facilities and landfills.

Knowledgeable in the requirements for D.O.T certification as described in 40 CFR 383, 390-397, and 399 and 49 CFR 172, 177, and 263 for the transport of hazardous materials.

Personnel conducted environmental audits of 23 HTRW TSD facilities (incineration, chemical treatment, recycling and landfill).

Complete Experience Record:

Sevenson Environmental Services, Inc. (1991 to Present)

Mr. Paisley brings to Sevenson Environmental Services, Inc., a background in many component areas of hazardous waste site remediation. He has worked in the nuclear/chemical waste industry. He has served as a TSD facility waste approval coordinator and has been a technical representative for regulatory issues, as well as a manager of remediation projects. This diverse background enables Mr. Paisley to interface effectively with hazardous waste generators, project management, regulatory agencies, and subcontractors. Technical Affairs Manager, Mr. Paisley is responsible for regulatory compliance matters on all Sevenson projects. He provides support services to project management on technical issues pertinent to proper waste andling techniques. He also develops and manages waste characterization plans consisting of sampling protocol, analytical requirements, and final waste disposition. In addition, he sources and evaluates all analytical, transportation, and disposal subcontractors. Mr. Paisley's project experience is as follows:

Manifest Review/Approval Project Cost Management Waste Classification On-site/Off-site Treatment Truck/Rail Transport TSD Compliance Evaluations Permit Identification OAPP/SAP Preparation

Select Project Experience:

- Cumberland Bay Site (NYS Superfund), Plattsburgh, NY Technical Affairs Manager for the dredging, dewatering, treatment, and disposal of approximately 90,000 cubic yards of PCB sludges from a 34 acre area of Lake Champlain. In addition, 20,000 cubic yards of shoreline were excavated for disposal. Duties included the placement, staffing and coordination of an on-site laboratory to perform immunoassay testing to determine PCB concentrations in waste prior to off-site disposal. Planned and coordinated all other site analytical testing including the placement of real-time monitors to determine Total Suspended Solids (TSS) content outside of sheet-piled areas and at water discharges. Arranged for and coordinated the shipment of all site waste to either non-hazardous or TSCA landfills, as applicable.
- Austin Avenue Radiation Superfund Site, Lansdowne, Pa Technical Affairs Manager for the
 radiological remediation of 21 properties contaminated with radium-226 and thorium-230 tailings.
 Sevenson selectively removed and segregated radiologically contaminated portions of the properties.
 These were then staged, packaged and transported for offsite disposal via truck and rail.
- W.R. Grace & Company, Inc., Chattanooga, TN Technical Affairs Manager for the hydraulic dredging and dewatering of 60,000 cubic yards of sediments from rare earth ponds and excavation and solidification of 40,000 cubic yards sediments from thorium ponds. Dewatering performed with three 200 cubic foot plate and frame filter presses. Treated radiologically contaminated sediments disposed of in an approved disposal facility. Arranged for and coordinated the rail transportation and offsite disposal of all treated soils.
- Purolator Products, Inc. Elmira, NY Technical Affairs Manager for the excavation and disposal of 12,000 tons of RCRA hazardous soils and solids and 21,000 tons of non-RCRA hazardous soils from a currently operating automotive supply manufacturer. Prepared and supervised implementation of an in situ sampling program to determine waste classification. Coordinated transportation and disposal via landfilling, chemical oxidation, and incineration. Supervised the operation and permit compliance of a 50,000 gallon batch water treatment plant.
- Rockwell International, Russelville, KY Technical Affairs Manager for the excavation and disposal
 of 80,000 tons of non-RCRA hazardous sediments and 21,000 tons of PCB sediments from the
 dredging and removal of approximately 1.5 miles of stream bank. Coordinated with the owner's on-site
 Engineer to conduct a pre-excavation and post-excavation sampling to determine the depth and lateral
 extent of dredging/excavation activities. Supervised the operation and permit compliance of a
 continuous discharge water treatment plant at the site.
- Carter Industrial Site, Detroit, MI Technical Affairs Manager for the excavation and off-site disposal of 35,000 tons of PCB contaminated soils and debris, 20,000 tons of non RCRA hazardous solids and approximately 200 drums and cylinders. Duties included development and implementation of a pre-excavation and post-excavation soil sampling plan as well as a drum characterization and sampling plan. Also coordinated the on-site treatment, delisting, and verification sampling of 5,000 tons of lead contaminated soil. Arranged for and coordinated the off-site disposal (landfill) of all site wastes at the appropriately permitted landfills.

- **Taylor Instruments Site, Rochester, NY** Technical Affairs Manager for the excavation and off-site disposal of 43,000 tons of non hazardous, mercury and solvent contaminated soils and debris from the demolition and removal of a former mercury instrument manufacturing facility. Coordinated the sampling and off-site disposal of all site wastes to the appropriate (landfill, stabilization, chemical treatment and mercury recycling) facility. Large quantities of free mercury and soils with mercury levels exceeding the High Mercury Land Ban Subcategory necessitated special handling and disposal requirements.
- Commercial Oil Site, Oregon, OH Technical Affairs Manager for the characterization, consolidation and off-site disposal of the contents of 30 bulk oil storage at this former waste oil recovery facility. Coordinated the sampling and analysis of the various phases and contents of all tanks at the site. Waste materials were consolidated based on their characteristics and compatibilities for off-site disposal (fuels blending/recovery, chemical treatment, and incineration).
- Barker Chemical Site (NYS Superfund), Sodus, NY Technical Affairs Manager for the excavation
 and offsite disposal of pesticide-contaminated soils, sediments, and debris. Duties included developing
 and coordinating pre-excavation (to establish excavation limits) and post-excavation (to verify
 completion) sampling plans. Arranged for and coordinated the transportation and disposal (through
 incineration, chemical oxidation treatment, and macroencapsulation) of 4,000 tons of contaminated soil
 and building demolition debris.
- Summit National Superfund Site (USEPA Region V), Deerfield, OH Technical Affairs Manager for the sampling, characterization, analysis, and disposal of approximately 500 drums of material and the contents of five underground storage tanks.
- Metaltec/Aerosystems Site (USEPA Region II), Franklin, NJ Technical Affairs Manager for the
 onsite thermal treatment of approximately 11,000 tons of hazardous soils. Coordinated the posttreatment sampling of ash to verify that site-specific treatment criteria were met and that waste was
 correctly classified. Arranged for and coordinated the transportation and offsite disposal of all treated
 soils.
- Marathon Battery Site, Cold Spring, NY Technical Manager responsible for all on-site regulatory
 compliance matters. Duties include on-site supervision of pre- and post-excavation and treatment
 sampling programs; quality control of off-site analytical laboratories; interfacing with off-site disposal
 facilities; and liaison with the client regarding waste classification issues. Coordinated the offsite
 transportation and disposal via rail of 150,000 tons of delisted soils and sediments.
- Madison Wire Site, West Seneca, NY Technical Manager responsible for all on-site regulatory compliance matters. Duties included supervision of an extensive in-situ sampling program to characterize the waste based upon "as-excavated" chemical characteristics; conducted post-excavation sampling program including expedited turnaround by off-site laboratories (with appropriate levels of QC) to facilitate ongoing excavation activities.

- Blosenski Landfill Site, Coatesville, PA Technical Manager responsible for all on-site regulatory compliance matters. Duties included management of all on-site sampling and analysis programs, including development of a sample compositing and characterization program using an on-site laboratory. Also facilitated early completion of the project by utilizing several disposal methodologies in parallel (incineration, chemical stabilization, and RCRA landfill) to facilitate the removal of 1,200 tons of contaminated soils and 1,000 buried drums in a 14 day timeframe.
 - Lacey Road Airstrip Site, Forked River, NJ Technical Manager responsible for all on-site regulatory compliance matters. Duties included development and implementation of a rigorous in-situ sampling and analysis program which allowed the segregation of wastes based upon halogenated organic (HOC) content. Coordinated the use of several off-site disposal outlets (incineration and landfill) to ensure proper disposition of the wastes prior to the implementation of the third-third land ban regulations.

Stout Environmental, Inc., Bordentown, NJ (1988 to 1991)

Technical/Waste Approvals Coordinator, responsible for all technical aspects of HTRW projects, as well as technical support for approval of wastes into the Stout TSD facilities. Duties included:

 Development and management of proper waste sampling protocol, interpretation of chemical analyses, classification of waste materials, compliance with applicable laws and regulations, and securing approvals for shipment of waste to TSD facilities. Coordinated project estimating and prepared technical work plans for various types of HTRW activities.

Comparable Project Experience:

• Borne Chemical Site, Elizabeth, NJ - Technical Manager responsible for waste classification and disposal. Duties included supervision of all site sampling, analysis, characterization programs, including determination of appropriate consolidation and off-site disposal methods and facilities. Also established and supervised the operation of an on-site laboratory, as well as contracting for disposal of all wastes via aqueous treatment, landfill, incineration and fuels blending, as appropriate.

APPENDIX D
TRANSPORTER SPILL CONTINGENCY PLANS

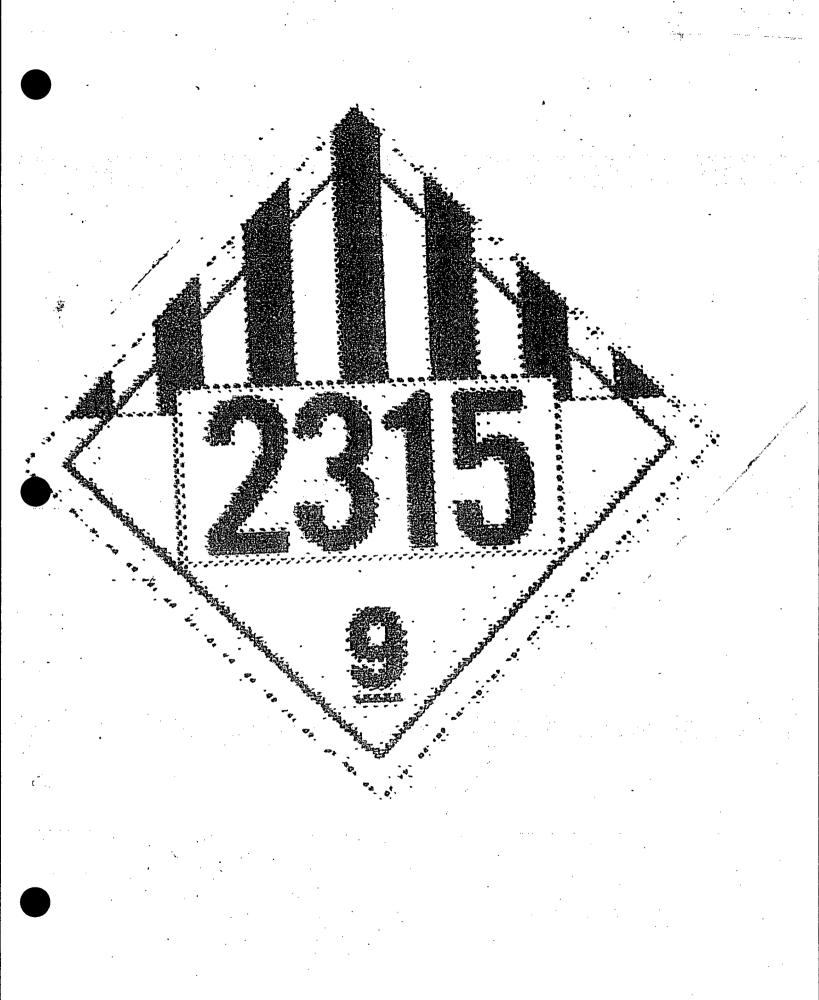
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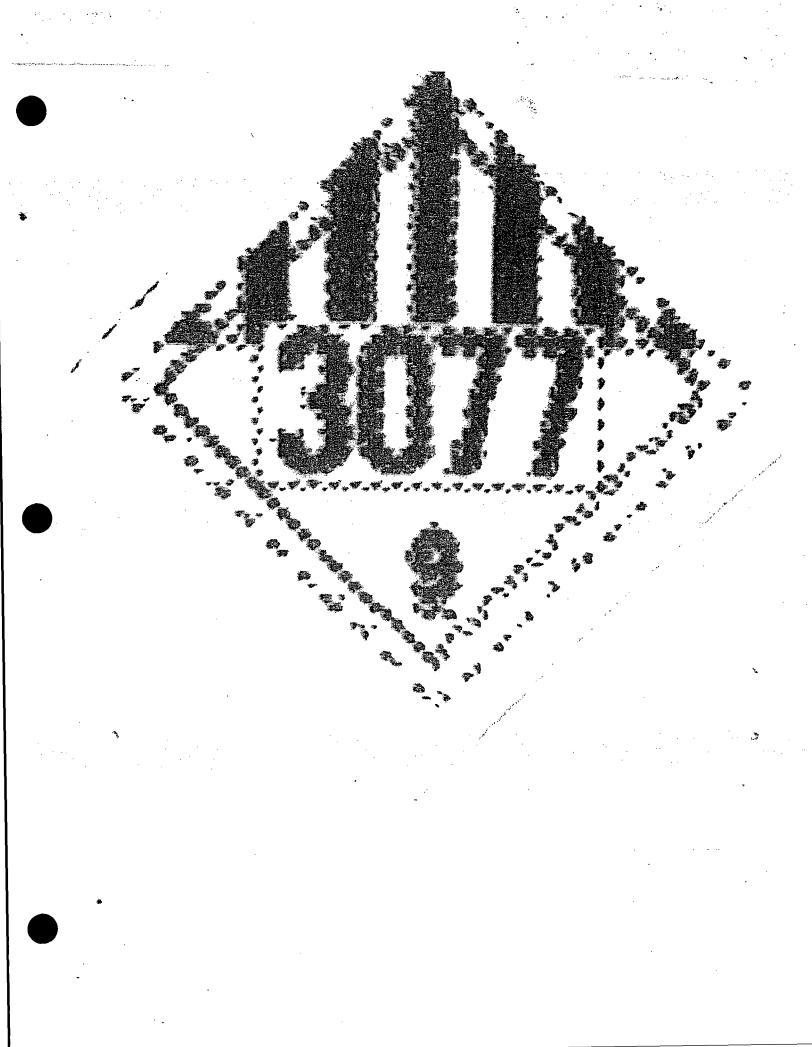
APPENDIX E
EXAMPLE SHIPPING PAPERWORK

GENERATOR ————————————————————————————————————	NON-HAZARDOUS SITE EPA ID#	2 Page	1 of 3. Emer	gency Respons 123) 45	6-7890	4. Waste Ti	racking Nu	Load	#	
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	Site Address				•		•			
	Generator's Phone: (123) 456-7890 Con	tact	1							
	6. Transporter 1 Company Name					U.S. EPA ID	Number	T.B.D.		
	XYZ Trucking 7. Transporter 2 Company Name		· · ·	- 1 - 1	<u> </u>	U.S. EPA ID		ויטיטי		
				*				· .		
	8. Designated Facility Name and Site Address	·				U.S. EPA ID		_		
	ABC Disposal						T.B.	D.		
	Facility's Phone: (123) 456-7890	Ą						· .		
	9. Waste Shipping Name and Description			10. Cont		11. Total Quantity	12. Unit Wt./Vol.			
	議議 1.			No.	Туре	Continy	771.5 VOI.		15 (1945)	
ATOF	Non-DOT Regulated Materia	l		X	X	X	X.			
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	Approval #									
	Delivery Time:									
										
	14. GENERATOR'S CERTIFICATION: I certify the materials described above of Generator's/Offeror's Printed/Typed Name	on this manifest are not	subject to feder Signature	ral regulations fo	or reporting pr	oper disposal of I	lazardous \	Waste. Month	Day	Year
V	XPrint Name		Olgrature		Si	ign Name)		ate"	
INT'L	15. International Shipments Import to U.S.	Export	from U.S.	Port of e	entry/exit:			l		
	Transporter Signature (for exports only): 16. Transporter Acknowledgment of Receipt of Materials	·	····		aving U.S.:		•			
TRANSPORTER	Transporter 1 Printed/Typed Name XPrint Name		Signature					Month	Day	Year
SPO	XPrint Name				Si	gn Name	<u> </u>	Da	<u> </u>	
HAN	Transporter 2 Printed/Typed Name	•	Signature					Month I	Day 1	Year I
<u> </u>	17. Discrepancy		<u></u>	*****					<u> </u>	<u> </u>
1	17a. Discrepancy Indication Space Quantity	Туре	Γ	Residue		Partial Re	lection	П	Full Rejec	
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	17b. Alternate Facility (or Generator)		Mai	nifest Reference	Number:	U.S. EPA ID	Number			_
늦						3.3. 2. 7.10				
ĭ	Facility's Phone:						_			
_	17c. Signature of Alternate Facility (or Generator)							Month I	Day	Year
ATED										ı
	18. Designated Facility Owner or Operator: Certification of receipt of materials Printed/Typed Name	covered by the manifest	t except as note	ed in Item 17a				Month	Day	Year

Plea	se print or type. (Form designed for use on elite (12-pitch) typewriter.)					pproved. OMB No	o. 2050-0039
1	UNIFORM HAZARDOUS 1. Generator ID Number Site EPA ID#	X	123) 456-7890	00		. 086 i	IJK
T	5. Generator's Name and Mailing Address Site Mailing Address	Genera	tor's Site Address (if different th	an mailing addre	SS)		
	Generator's Phone: (123) 456-7890 Contact Name				,		
	6. Transporter 1 Company Name XYZ Trucking				.B.D.		
	7. Transporter 2 Company Name			U.S. EPA ID I	Number		
	8. Designated Facility Name and Site Address			U.S. EPA ID	Number		
	ABC Disposal Facility's Phone: (123) 456-7890			-l -	T.B.D.		
	9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	;	10. Containers No. Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Co	des
TOR	1. DOT Chinain Mann	^	X X	χ	X -	X	
GENERATOR	Hazard Class, DOT ID#, Packing (Group		today of Paragraph and			1
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	3.						
				:			
	4.						
	14. Special Handling Instructions and Additional Information Approval # ER	G#:		·			
	Delivery Time:				•		
	 GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of the marked and labeled/placarded, and are in all respects in proper condition for transport ac 	ccording to applicable in	temational and national governr				
	Exporter, I certify that the contents of this consignment conform to the terms of the attach I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a lar Generator's/Offeror's Printed/Typed Name	arge quantity generator)		enerator) is true.		Month D	Your Voor
Ų	Print Name	Signature		Sign N	ame	Date	Day Year
TRANSPORTER INT'L	16. International Shipments Import to U.S. Transporter signature (for exports only):	Export from U.S.	Port of entry/exit: Date leaving U.S.:				
RTER	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name	Signature	· . ·	Cian I	lomo	Month D	ay Year
NSPC	Print Name Transporter 2 Printed/Typed Name	Signature		Sign I	valle	Date	Day Year
TRA			· · · · · · · · · · · · · · · · · · ·		·		
	18. Discrepancy 18a. Discrepancy Indication Space Quantity Type		Residue	Partial Re	ejection	Full 1	Rejection
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FACILITY	18b. Alternate Facility (or Generator)			U.S. EPA ID	Number		-
							_
ED	18c. Signature of Alternate Facility (or Generator)					Month	Day Year
DES	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste tre	eatment, disposal, and r	ecycling systems)	4.			
1							
$\ $	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials cover Printed/Typed Name	rered by the manifest ex Signature	cept as noted in Item 18a			Month	Day Year
Ų		1					

APPENDIX F
EXAMPLE PLACARDS





APPENDIX G
TRANSPORTATION ROUTES

misley, Ken

Subject: FW: Cornell Dubilier Superfund Site - South Plainfield, NJ C&D debris T&D

Truck Route from Pioneer Crossing Landfill to Cornell Dubilier Superfund Site South Plainfield, NJ

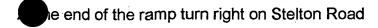
Take the Pennsylvania Tumpike East to

New Jersey Turnpike North to

Exit 10

Take 287 North

Get off Exit 4



Take Stelton Road to S. Clinton Road (RT 603)

Turn left on S. Clinton Road follow down to New Market Ave.

Turn right on New Market Avenue

Follow to dead end.

Go across Hamilton Street and straight into job site.



Start: 333 Hamilton Blvd

South Plainfield, NJ 07080-3339,

US

End: Model City, NY US

Notes:

Directions to CWM/Waste Management

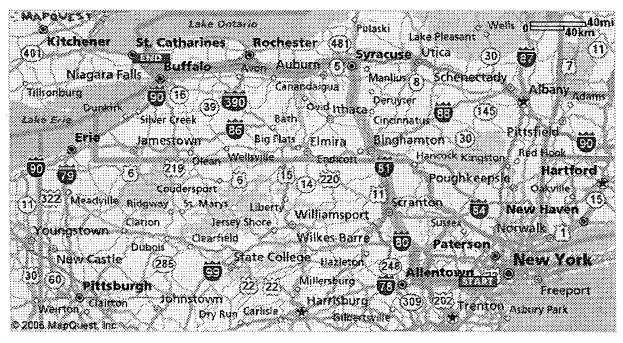
Model City, NY



Directio	ns	Distance
Total	Est. Time: 6 hours, 50 minutes Total Est. Distance: 417.74 miles	
37477	1: Start out going SOUTH on HAMILTON BLVD toward LAKEVIEW AVE / CR-603.	1.3 miles
(2: Turn RIGHT onto HAMILTON BLVD / CR-603.	1.1 miles
	3: Turn LEFT onto STELTON RD / CR-529.	<0.1 miles
	4: Merge onto I-287 N via the ramp on the LEFT.	12.1 miles
(T)	5: Keep LEFT to take I-287 N toward I-78 W.	2.7 miles
0	6: Merge onto I-78 W via EXIT 21B on the LEFT toward EASTON PA (Portions toll) (Crossing into PENNSYLVANIA).	36.9 miles
(E)	7: Merge onto PA-33 N via EXIT 71 toward US-22 / STROUDSBURG.	28.2 miles
	8: Merge onto I-80 W via the exit on the LEFT toward HAZLETON.	9.0 miles
(TEID)	9: Merge onto I-380 N via EXIT 293 toward SCRANTON.	27.7 miles
1	10: Merge onto I-81 N toward BINGHAMTON (Crossing into NEW YORK).	130.7 miles
(17)	11: Merge onto I-690 W toward FAIRGROUNDS / BALDWINSVILLE.	8.8 miles
(B)	12: Merge onto I-90 W / NEW YORK STATE THRUWAY W via EXIT 1 toward BUFFALO (Portions toll).	131.0 miles
(1)	13: Merge onto I-290 W / YOUNGMANN EXPY via EXIT 50 toward NIAGARA FALLS.	9.8 miles
	14: Merge onto I-190 N toward NIAGARA FALLS (Portions toll).	14.2 miles

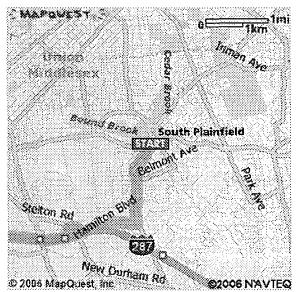
	15: Take the RT-265 exit- EXIT 25A- toward LEWISTON.	0.1 miles
	16: Turn LEFT onto MILITARY RD / NY-265.	0.1 miles
$ \Rightarrow $	17: Turn RIGHT onto UPPER MOUNTAIN RD / CR-11.	2.5 miles
(1)	18: Turn SLIGHT LEFT onto INDIAN HILL RD / CR-11.	0.4 miles
1	19: Keep LEFT at the fork to continue on INDIAN HILL RD / CR-11.	0.1 miles
1	20: INDIAN HILL RD / CR-11 becomes MODEL CITY RD.	0.4 miles
EIG	21: End at Model City, NY US	••••••
Total	Est. Time: 6 hours, 50 minutes Total Est. Distance: 417.74 miles	

Map out great hotel rates on Orbitz

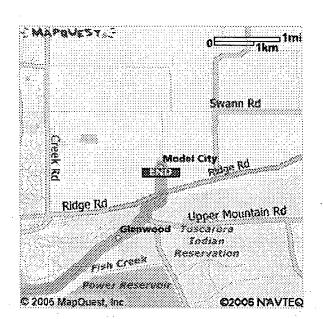


Start: 333 Hamilton Blvd South Plainfield, NJ 07099

South Plainfield, NJ 07080-3339, US



End: Model City, NY US



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These directions are informational only. No representation is made or warranty given as to their content, road conditions or route usability or expeditiousness. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.



Start: 333 Hamilton Blvd

South Plainfield, NJ 07080-3339,

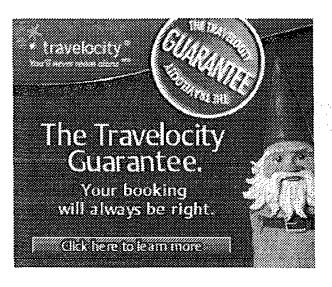
·US

End: Belleville, MI US

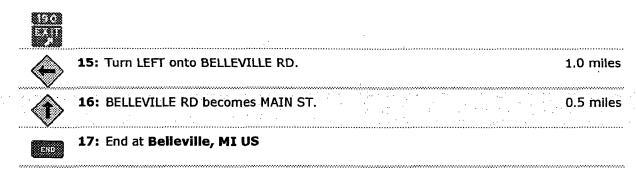
Notes:

Directions to EQ Compnay

Belleville, Mi

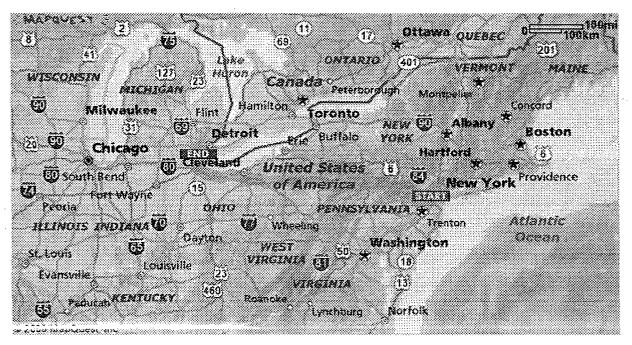


Directio	ons	Distance
Total	Est. Time: 9 hours, 42 minutes Total Est. Distance: 610.06 miles	
	 Start out going SOUTH on HAMILTON BLVD toward LAKEVIEW AVE / CR-603. 	1.3 miles
>	2: Turn RIGHT onto HAMILTON BLVD / CR-603.	1.1 miles
	3: Turn LEFT onto STELTON RD / CR-529.	<0.1 miles
(III)	4: Merge onto I-287 N via the ramp on the LEFT.	12.1 miles
	5: Keep LEFT to take I-287 N toward I-78 W.	2.7 miles
Ø	6: Merge onto I-78 W via EXIT 21B on the LEFT toward EASTON PA (Portions toll) (Crossing into PENNSYLVANIA).	36.9 miles
33	7: Merge onto PA-33 N via EXIT 71 toward US-22 / STROUDSBURG.	28.2 miles
(6)	8: Merge onto I-80 W via the exit on the LEFT toward HAZLETON (Portion toll) (Crossing into OHIO).	s 467.0 mile
	9: Merge onto I-280 N via EXIT 71 toward TOLEDO / DETROIT.	13.0 mile
	10: Take the exit on the LEFT.	0.1 mile
(T)	11: Merge onto I-75 N toward DETROIT (Crossing into MICHIGAN).	23.3 mile
	12: Merge onto I-275 N via EXIT 20 toward FLINT.	17.4 mile
(7)	13: Merge onto I-94 W via EXIT 17.	4.4 mile
	14: Take the BELLEVILLE RD exit- EXIT 190- toward BELLEVILLE.	0.3 mile



Map out great hotel rates on Orbitz

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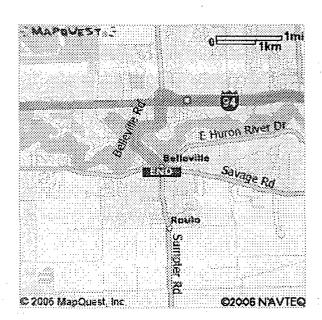
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Sampling and Analysis Plan Document Title	
USACE – Kansas City Dis Lead Organization	trict and USEPA Region II
Jennifer Singer, Sevenson Preparer's Name and Organi	Environmental Services, Inc.
2749 Lockport Road, Niag (716)284-0431 jsinger@sevenson.com	
•	ne Number, and E-mail Address
November 16, 2006 Preparation Date (Day/Month	n/Year)
Investigative Organization's	
- -	Kim Lickfield, Sevenson Environmental Services, Inc. Printed Name/Organization/Date
Investigative Organization's	Project QA Officer:
•	Signature Iliam Zambrana, Sevenson Environmental Services, Inc. Printed Name/Organization/Date
Lead Organization's Project	Manager:
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Approval Signatures:	
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	Approval Authority
	Signature Printed Name/Title/Date
•	Approval Authority
Other Approval Signatures:	
	Signature
	Printed Name/Title/Organization/Date

QAPP Worksheet #1 (UFP-QAPP Manual Section 2.1) -- Title and Approval Page

Title: Sampling and Analysis Plan Revision Number: 0 Revision Date: 11/16/06

QAPP Worksheet #2 (UFP-QAPP Manual Section 2.2.4) -- QAPP Identifying Information

Site Number/Code: Contract # W912DQ-04-D-0023, Delivery Order #0005

Operable Unit: OU-2 – Building Demolition, Cluster 12 Contractor Name: Sevenson Environmental Services, Inc.

Contractor Number: NA Contract Title: NA Work Assignment Number: NA 1. Identify guidance used to prepare QAPP: UFP-QAPP Version 1 (March 2005) Requirements for the Preparation of Sampling and Analysis Plans (USACE, February 2001) 2. Identify regulatory program: USEPA Region II, Superfund 3. Identify approval entity: USEPA Region II, USACE – Kansas City District 4. Indicate whether the QAPP is a generic or a project-specific QAPP. (circle one) 5. List dates of scoping sessions that were held: NONE General scoping sessions: List dates and titles of QAPP documents written for previous site work, if applicable: Title Received Date NONE 7. List organizational partners (stakeholders) and connection with lead organization: USEPA Region II - Oversight Organization 8. List data users: USEPA Region II, USACE - Kansas City District

9. If any required QAPP elements and required information are not applicable to the project, then circle the omitted QAPP elements and required information on the attached

table. Provide an explanation for their exclusion below:

Field Instrumentation – no field measurements will be made

Title: Sampling and Analysis Plan Revision Number: 0 Revision Date: 11/16/06

Circle QAPP elements and required information that are not applicable to the project. Provide an explanation in the QAPP.

Required QAPP Element(s) and Corresponding QAPP Section(s)	Crosswalk to Required Documents	Required Information
Project M	anagement and Obje	ctives
2.1 Title and Approval Page	a. See Worksheet #1	a. Title and Approval Page
 2.2 Document Format and Table of Contents 2.2.1 Document Control Format 2.2.2 Document Control Numbering System 2.2.3 Table of Contents 2.2.4 QAPP Identifying Information 	a. Table of contents included at the beginning of each section b. See Worksheet #2	a. Table of Contents b. QAPP Identifying Information
 2.3 Distribution List and Project Personnel Sign-Off Sheet 2.3.1 Distribution List 2.3.2 Project Personnel Sign-Off Sheet 	a. Worksheet #3 will be completed upon plan approval (copy attached) b. Worksheet #4 will be completed upon plan approval (copy attached)	a. Distribution List b. Project Personnel Sign-Off Sheet
2.4 Project Organization 2.4.1 Project Organizational Chart 2.4.2 Communication Pathways 2.4.3 Personnel Responsibilities and Qualifications 2.4.4 Special Training Requirements and Certification	a. Figure 2-1 (FSP) b. Figure 2-1, Table 2-1, and Section 2.3 (FSP) c. Section 2.3 (FSP) d. None	a. Project Organizational Chart b. Communication Pathways c. Personnel Responsibilities and Qualifications Table d. Special Personnel Training Requirements Table
Project Planning/Problem Definition 2.5.1 Project Planning (Scoping) 2.5.2 Problem Definition, Site History, and Background	a. None b. None c. Sections 1.2 and 1.3 (FSP) d. Figures 1-1 and 1- 2 (FSP)	a. Project Planning Session Documentation (including Data Needs tables) b. Project Scoping Session Participants Sheet c. Problem Definition, Site History, and Background d. Site Maps (historical and present)
Project Quality Objectives and Measurement Performance Criteria 2.6.1 Development of Project Quality Objectives Using the Systematic Planning Process 2.6.2 Measurement Performance Criteria	a. Section 3 (FSP) and Section 3 (QAPP) b. Section 3 (QAPP)	a. Site-Specific PQOs b. Measurement Performance Criteria Table
2.7 Secondary Data Evaluation	a. None, basic information in Sections 1.2 and 1.3 (FSP) b. None	a. Sources of Secondary Data and Information b. Secondary Data Criteria and Limitations Table
2.8 Project Overview and Schedule 2.8.1 Project Overview 2.8.2 Project Schedule	a. Sections 4.1, 4.2, 4.3, 4.4, 4.5 (FSP) b. Section 3.0 (FSP) and Table 3-3 (QAPP)	a. Summary of Project Tasks b. Reference Limits and Evaluation Table c. Project Schedule/Timeline Table

Required QAPP Element(s) and Corresponding QAPP Section(s)	Crosswalk to Required Documents	Required Information
Measu	rement/Data Acquisit	ion
3.1 Sampling Tasks 3.1.1 Sampling Process Design and Rationale 3.1.2 Sampling Procedures and Requirements 3.1.2.1 Sampling Collection Procedures 3.1.2.2 Sample Containers, Volume, and Preservation 3.1.2.3 Equipment/Sample Containers Cleaning and Decontamination Procedures 3.1.2.4 Field Equipment Calibration, Maintenance, Testing, and Inspection Procedures 3.1.2.5 Supply Inspection and Acceptance Procedures 3.1.2.6 Field Documentation Procedures	a. Sections 4.1, 4.2, 4.3, 4.4, 4.5 (FSP) b. None c. None d. Table 4-1 (FSP); Table 3-4 (QAPP) e. Section 4.7 (FSP); Section 3.4.1 (QAPP) f. Sampling techniques described in Sections 4.1, 4.2, 4.3, 4.4, 4.5 (FSP) g. None h. None	a. Sampling Design and Rationale b. Sample Location Map c. Sampling Locations and Methods/ SOP Requirements Table d. Analytical Methods/SOP Requirements Table e. Field Quality Control Sample Summary Table f. Sampling SOPs g. Project Sampling SOP References Table h. Field Equipment Calibration, Maintenance, Testing, and Inspection Table
3.2 Analytical Tasks 3.2.1 Analytical SOPs 3.2.2 Analytical Instrument Calibration Procedures 3.2.3 Analytical Instrument and Equipment Maintenance, Testing, and Inspection Procedures 3.2.4 Analytical Supply Inspection and Acceptance Procedures	a. Table 3-1 (QAPP) b. Table 3-1 (QAPP) c. Section 6.0 (QAPP) d. Section 11.0 (QAPP)	a. Analytical SOPs b. Analytical SOP References Table c. Analytical Instrument Calibration Table d. Analytical Instrument and Equipment Maintenance, Testing, and Inspection Table
3.3 Sample Collection Documentation, Handling, Tracking, and Custody Procedures 3.3.1 Sample Collection Documentation 3.3.2 Sample Handling and Tracking System 3.3.3 Sample Custody	a. Section 5 and 6 (FSP); Section 4 (QAPP) b. Section 5.2 (FSP) c. Section 5 and 6 (FSP); Section 4 (QAPP) d. Appendix A	a. Sample Collection Documentation Handling, Tracking, and Custody SOPs b. Sample Container Identification c. Sample Handling Flow Diagram d. Example Chain-of-Custody Form and Seal
3.4 Quality Control Samples 3.4.1 Sampling Quality Control Samples 3.4.2 Analytical Quality Control Samples	a. Section 4.7 (FSP); Section 3.4.1 (QAPP); Section 7, (QAPP) b. None	a. QC Samples Table b. Screening/Confirmatory Analysis Decision Tree
3.5 Data Management Tasks 3.5.1 Project Documentation and Records 3.5.2 Data Package Deliverables 3.5.3 Data Reporting Formats 3.5.4 Data Handling and Management 3.5.5 Data Tracking and Control	a. Section 5, Section 8 (FSP); Section 10 (QAPP) b. Section 10.4 (QAPP) c. Section 10.4 (QAPP)	a. Project Documents and Records Table b. Analytical Services Table c. Data Management SOPs
As	sessment/Oversight	
4.1 Assessments and Response Actions 4.1.1 Planned Assessments	a. Section 12 (QAPP) b. Section 12	a. Assessments and Response Actions b. Planned Project Assessments Table



Title: Sampling and Analysis Plan Revision Number: 0 Revision Date: 11/16/06

QAPP Worksheet #4 (UFP-QAPP Manual Section 2.3.2) -- Project Personnel Sign-Off Sheet

Have copies of this form signed by key project personnel from each organization to indicate that they have read the applicable QAPP sections and will perform the tasks as described. Ask each organization to forward signed sheets to the central project file.

Organization:				
				Date QAPP Read
Project Personnel	Title	Telephone Number	Signature	Email Receipt

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Drummed and Hazardous Materials Handling Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023
Task Order - 0005
Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 30, 2006

DRUMMED AND HAZARDOUS MATERIALS

HANDLING PLAN

CORNELL-DUBILIER ELECTRONICS SUPERFUND SITE

SOUTH PLAINFIELD, NEW JERSEY

CLUSTER 12

November 2006

CONTRACT NO. W912DQ-06-D-0006

Prepared By:



Prepared for:



U.S. ARMY CORPS OF ENGINEERS KANSAS CITY DISTRICT OFFICE

Prepared For:

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LIST OF ACRONYMS

LIST OF FIGURES

Figure 2-1 Site Map

Figure 2-2 Cluster Designations

LIST OF APPENDICES

APPENDIX A Forms

APPENDIX B Hazcat Testing Protocols

LIST OF ACRONYMS

\cdot						
ACM Asbestos Containing Material						
CERCLA Comprehensive Environmental Response, Compensation and Liability Act						
CFR Code of Federal Regulations						
DSA Drum Storage Area						
NJDEP New Jersey State Department of Environmental Protection						
OSHA Occupational Safety and Health Act						
OU Operable Unit						
PCB Polychlorinated Biphenyls						
PID Photoionization Detector						
PPE Personal Protective Equipment						
<u> </u>						
ppm parts per million						
RCRA Resource Conservation and Recovery Act						
SAP Sampling and Analysis Plan						
Sevenson Sevenson Environmental Services, Inc.						
SSHP Site-specific Safety and Health Plan						
SVOC Semi-volatile Organic Compounds						
TCLP Toxicity Characteristic Leaching Procedure						
TSCA Toxic Substance Control Act						
USACE Unites States Army Corps of Engineers						
the state of the s						
USDOT United States Department of Transportation						
USEPA U.S. Environmental Protection Agency						
VOC Volatile Organic Compounds						
WMT&DP Waste Management, Transportation and Disposal Plan						
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1.0 INTRODUCTION

This Drummed and Hazardous Material Handling Plan (the "Plan") was prepared by Sevenson Environmental Services, Inc. (Sevenson) for the Cornell-Dubilier Electronics Superfund Site (the "Site") in South Plainfield, New Jersey. This Plan will address the handling, sampling, staging and off-site disposal of drummed and miscellaneous containerized hazardous materials at the Site.

2.0 BACKGROUND INFORMATION

2.1 Site Location

The site is located at 333 Hamilton Boulevard in South Plainfield, New Jersey in what is now the Hamilton Industrial Park occupied by an estimated fifteen commercial businesses. Through the years, numerous companies have operated at the site as tenants. It is estimated that approximately 540 people reside within 0.25 miles of the site and the nearest residential homes are less than 200 feet from the site (USEPA, 2006). An unnamed tributary to the Bound Brook traverses the southeast corner of the site property. A site location map is included as Figure 2-1. Operable Unit 2 (OU-2) addresses the remediation of source materials, including contaminated facility soils and buildings. OU-2 has been divided into "Clusters", indetified as clusters 1 through 12; Figure 2-2 shows a site plan with the cluster designations.

2.2 Site History

Cornell-Dubilier Electronics, Inc. manufactured electronic parts and components, including capacitors, from 1936 to 1962. Polychlorinated biphenyls (PCBs) and chlorinated organic degreasing solvents were used in the manufacturing process. It is alleged that during the period of operation, Cornell-Dubilier Electronics, Inc. dumped PCB-contaminated materials and other hazardous substances directly onto site soils. A

former employee has claimed that the rear of the property was saturated with transformer oils and that capacitors were also buried behind the facility during the same time period (Foster Wheeler, 2002).

The soil at the site is contaminated with volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), inorganic constituents, and PCBs. In addition, building interiors at the site have been found to contain elevated levels of PCBs and metals. Historical site data pertaining to OU-2 was collected between 1997 and 2002 and are summarized in the *Final Remedial Investigation Report for OU-2 Onsite Soils and Buildings* (Foster Wheeler, 2002). In addition, summary tables of historical data pertaining to OU-2 buildings are included in the *Data Summary Report*, *Operable Unit 2 – Building Demolition*, 75% Completion Phase (Malcolm Pirnie, 2006).

2.2.1 OU-2 Overview

In September, 2004, the EPA issued a Record of Decision (ROD) (EPA 2004) for OU-2 describing the selected remedy for the Site. Site remediation activities under OU-2 include the demolition of Site buildings and structures, debris and soil removal (only those soils in close proximity to removed debris), and Site restoration via backfilling and paving.

Demolition and remediation at the Site will proceed in phases. There are (19) nineteen buildings and (2) two structures on-site that have been grouped into the designated clusters. Demolition and removal activities will proceed cluster-by-cluster as

directed by USACE and detailed and scheduled in the Site Operations, submitted under separate cover.

There are currently tenants which occupy some of the Site buildings who will be relocated during the project. All Site activities will be conducted, as necessary, to accommodate these tenants and to maintain project schedule.

2.3 Drummed and Hazardous Materials Identification

Documentation of potential drummed and hazardous materials that may be encountered during remedial activities at the Site may be found in the Data Summary Report (Malcom Pirnie, Inc., 2006). Preparation of this report included an inventory of Site building and structures. Data related to this visual inventory including location maps, descriptions and quantities of items' contents, are summarized in the Design Drawings prepared by Malcolm Pirnie under contract to the US EPA. This inventory includes such items as: asbestos containing material (ACM), fluorescent light ballasts/bulbs, mercury vapor lamps, thermostats, mercury switches, and creosote containing wood blocks.

Additional materials that may be generated during remedial activities or may be left by vacating tenant may include: used oils, gasoline or diesel fuel, hydraulic fluids, paints, aerosols and paint chips. These materials may be considered hazardous, and as such, their management and offsite disposal may be regulated under Department of Transportation (DOT), New Jersey solid waste and/or US EPA hazardous waste regulations.

2.4 Drummed and Hazardous Materials Characterization

Based upon past available Site surveys and inventories, hazardous materials are known to exist at the Site in either drums or miscellaneous containers, or, present throughout the Site (i.e. lights, ballasts, etc.). These materials will be confirmed as present and removed by waste-type prior to the commencement of demolition activities in each cluster. Only non-empty drums or containers will be managed for off-site disposal; those meeting the definition of "RCRA-empty" per 40 CFR 261.7 will be managed with Site demolition debris.

Bulk-able wastes will be collected and drummed by waste type. Sampling and additional characterization analysis may be conducted, as necessary, per the Site-specific Sampling and Analysis Plan (SAP), submitted under separate cover. A summary of potential sources of materials, and their classifications are as follows:

Material Type	Potential Disposal Classification
Friable ACM	TSCA Regulated (PCB > 50 ppm)
Fluorescent Lights	Universal Waste (as required, per 40 CFR 261.9)
Mercury Lights	RCRA Regulated (D008 per 40 CFR 261.24)
Light Ballasts	TSCA Regulated (PCB > 50 ppm)
Thermostats/Switches	RCRA Regulated (D008 per 40 CFR 261.24)
Creosote Wood Blocks	RCRA Regulated (D-listed per 40 CFR 261.24)

3.0 HEALTH AND SAFETY

During drum removal, handling, staging, characterization and disposal activities, health and safety procedures will be executed to provide the proper level of personal protection for on-site workers and to prevent off-site exposure to airborne contaminants. Work activities will be conducted in accordance with the Site Safety and Health Plan (SSHP), submitted under separate cover. As indicated in these plans, health and safety procedures will meet the applicable requirements of 29 CFR 1910 and 1926. The following information is a brief summary of specific health and safety protocols to be utilized during drum handling operations.

3.1 POTENTIAL HAZARDS

Potential physical and chemical hazards encountered during the process of drum handling, characterization and on-site transport will be presented in a task-specific job hazard analysis within the SSHP. This will include procedures for managing bulging or suspect drums and the use of non-sparking tools within certain areas. This Plan will also discuss hazards associated with the on-site activities, including explosions, fires, spontaneous reactions, release of toxic/noxious fumes and major spills. Hazards associated with off-site transport of materials for disposal will be discussed in the Waste Management, Transportation and Disposal Plan, submitted under separate cover

3.2 WORK AREA BOUNDARIES

Prior to the start of work activities, an exclusion zone around each building or structure will be established using orange construction fencing or similar material. Sevenson will have immediate control of the exclusion zone, with the Site health and safety officer providing oversight. All personnel, equipment and any drums/containers will enter or exit the exclusion zone through a fixed access point. A temporary decon station will be placed at this access point for personnel and equipment decon.

3.3 PERSONAL PROTECTION EQUIPMENT

The level of required personal protection equipment (PPE) will be determined by the Health and Safety Officer in accordance with the SSHP. Due to the potential unknown nature of some drums or containers, it may be necessary to utilize Level C PPE. Decisions regarding the levels of protection will be made by the onsite health and safety officer and Sevenson's corporate Health and Safety Director.

Workers transporting individual or palletized drums from a cluster area to the Drum Staging Area described in Section 5.3 will utilize Modified Level D PPE unless field conditions indicate a higher level of PPE is required. Upgrading or downgrading of PPE will be determined by the Health and Safety Officer based on field conditions in accordance with the SSHP.

4.0 AIR MONITORING AND DUST CONTROL

This section discusses air monitoring and dust control procedures to be utilized during drum/container collection, transfer and handling activities.

4.1 AIR MONITORING

Air monitoring will be conducted at each cluster work zone, site perimeter and drum staging area during removal and handling activities in accordance with the Air Monitoring Plan, submitted under separate cover. Additional personnel air monitoring may be conducted during drum handling in accordance with the SSHP. Personnel air monitoring is typically utilized to assess the adequacy of PPE levels for the actual levels of exposure encountered in the field.

4.2 DUST AND ODOR CONTROL

Dust control is not anticipated to be a concern during drum/container inventory, collection and handling. Potential emissions of dust or particulates will be evaluated if drum contents are deemed suitable for bulking for waste consolidation purposes.

Consolidation of dry or dusty drum contents is will be conducted to minimize air releases (i.e. slowly emptying drums). Misting or spraying the contents with water, after a determination of no potential water-reactive consequences has been made, may be necessary in some cases.

Drums or containers of extremely odorous material or those capable of releasing irritating vapors will be identified as such and labeled for cautious management. If necessary, identified drums may be placed into secondary, sealed containers (i.e. overpacks) prior to transfer or storage in the Drum Storage Area (DSA).

5.0 DRUM HANDLING, REMOVAL AND STAGING

This section details procedures for identification, removal and handling of drums from cluster areas. As Site activities continue, these procedures will be evaluated, modified, and/or expanded as needed.

5.1 __ INITIAL INSPECTION

An initial walkthrough survey will be conducted in each cluster building or area prior to the start of demolition to identify all drums or containers that may be present. Each non-empty container will be issued an Identification Number (ID Number), and its location, type, condition, estimated volume and potential contents will be recorded on a Drum Inventory Sheet. (See Appendix A, "Forms"). Each drum or container ID Number will be written on the top and one side with a paint pen. The written documentation log will be transferred with the drum to the DSA for use by DSA personnel. The condition of each drum will be evaluated during this initial inspection. Bulging or "sucked-in" drums, non-standard construction containers or those with obvious signs of corrosion, rusting or crystalline formations will be noted and managed separately. If drums in good condition do not have lids, a replacement lid will be placed on the drum prior to transfer to the DSA. Leaking drums will be inspected, documented, numbered and placed in an overpack prior to transfer to the DSA. Where possible, drums will be placed upright in overpacks for ease of access for later sampling and/or bulking. The determination to place drums in an overpack will be made by the Field Supervisor and/or Health and

Safety personnel. Empty overpacks will be stored at the DSA with a small quantity stored at each cluster for ease of access.

Small containers of waste (i.e., paint cans, aerosols, etc.) will be collected from within each cluster building or area and brought to a central, temporary staging area within that building. These collected small containers will be placed on plastic sheeting to prevent release of material. Small containers will be preliminarily grouped, if possible, by material type. Like containers of materials will be placed into larger containers (5-gallon pails, 30-gallon or 55-gallon drums) for consolidation and transport to the DSA. Drum Inventory Sheets and ID numbers will be generated for these consolidated containers.

Complete unknown containers, whether drum-size or smaller, will be kept separate and managed as separate containers.

Other hazardous materials from within each building will also be consolidated at the temporary staging area in that building at this time. Fluorescent lights, mercury lights, ballast, thermostats and switched will be collected and placed into containers by material type for inventory and tracking.

Drums which are RCRA-empty per 40 CFR 261.7 will be labeled as such for tracking purposes. According to 40 CFR 261.7, a container is considered RCRA-empty when:

- All wastes have been removed that can be removed using common practices such as pouring, pumping and aspirating; and
- No more than 1 inch of residue remains on the bottom of the container or inner liner; or

 No more than 3% by weight of the total capacity remains if the container is less than or equal to 110 gallons in size.

Although they will not be issued unique ID numbers, a list of the number and type of containers deemed RCRA empty will be generated for each building or cluster.

5.2 DRUM REMOVAL

Following inspection and logging, drums will be removed from the cluster building or area using a BobcatTM or all-terrain forklift with drum grappler or bucket sling or other conventional construction equipment suitable for drum handling. Drums and/or containers will be inspected of prior to any attempt at lifting as well as removal to ascertain the integrity of the container. Handling of drums will be minimized to the extent possible in order to reduce risks associated with physical hazards and potential chemical exposures. The removal device(s) will ultimately be selected in the field based upon the condition of the drums and distance from each individual cluster building to the DSA. Drums may also be palletized for transport to the DSA. Up to four drums may be placed and singly banded on each pallet.

Existing access roads will be evaluated for transport of drums from each cluster building or area to the DSA prior to the start of work tasks in those clusters. If necessary, existing access roads will be modified during site preparation to be acceptable for drum transfer.

5.3 DRUM STORAGE AREA CONSTRUCTION

A central Drum Storage Area will be constructed at the site for use for storage of collected and consolidated drums, containers and bulkable hazardous materials from each

cluster building or area. Drums and containers will be stored at this DSA during any additional characterization sampling that may be conducted, and until arrangements for final offsite disposal are made.

Initially, the construction of an area of approximately (30) thirty by (30) thirty feet in Building 10A is anticipated. Access to the DSA will be through the sliding double-doors of this building. The doors will be locked unless access is required to insure security.

The DSA will consist of a base of 20-mil poly liner draped over a sandbag perimeter. Sandbag height will be sufficient to assure an interior area containment volume equal to at least 110% of the contents of materials placed within. A ramped entry point and a 2-inch volume of sand will be placed within the containment area to provide access to transport units and prevent tearing of the poly liner.

The DSA will be apportioned to accommodate the segregation of non-compatible hazardous materials. Container storage placement within the DSA will adhere to the requirements of 49 CFR 177.848 regarding the segregation and separation of hazardous materials. In general, and based upon the Data Summary Report (Malcolm Pirnie, 2006) and Site history, it is anticipated that the DSA will be divided into areas for the storage of the following types of materials:

- Non-Hazardous or Regulated Solids (Soils, debris or other inert solids)
- Non-Hazardous or Regulated Liquids (Decon waters, sump waters or oils)
- Hazardous Solids (PCB ballasts, lead paint chips)
- Flammable Liquids (Gasoline or cleaning solvents)
- Acids (Industrial products)

- Caustics (Industrial products or cleaning products)
- Pressurized Containers (Propane or gas cylinders or aerosol cans)
- Unknowns

An inventory list and schematic drawing of the DSA will be maintained at the Site. An update of the containers (by assigned ID Number) will be made as drums are moved into and out of the DSA, or, at a minimum, on a weekly based. This inventory will include the Drum Inventory Sheet used for tracking each drum into and out of the DSA and the approximate total volume, by material type.

6.0 DRUM SAMPLING

This section discusses the sampling and characterization of drums and containers following transport to the DSA.

6.1 SORTING AND UNLOADING

Initially, all drums will be unloaded and placed in the DSA for re-inspection and confirmation of Drum ID information. Drums will be placed into the DSA by their known or suspected compatibility properties. Aisle space will be provided between each storage sub-area in accordance with OSHA requirements to allow passage of equipment and personnel. Additional characterization testing (i.e., hazcat) testing may be conducted at this time. Loading and movement of palletized drums and overpacks will be conducted with forklifts. Movement of individual drums or overpacks, if necessary, will be conducted with forklifts with grappler or sling attachments or with a drum dolly.

6.2 INSPECTION AND SAMPLE COLLECTION

6.2.1 DRUM ENTRY AND INSPECTION

Once placed in the DSA, a determination of whether sampling and hazcating of individual drums will be made. If a drum is to be sampled, the lid will be carefully removed using non-sparking tools. Suspect drums that exhibit bulging may be opened using remote entry tools such as a drum punch mounted on a backhoe. The following observations will be made and documented in the Drum Log (See Appendix A):

Material type (i.e., solid, liquid, sludge) and color;

- Estimated volume (percentage);
- PID/OVA/ O2/Explosionmeter readings; and
- Any changes to the drum's exterior condition including expansion or distention.
- Unique or identifiable markings

6.2.2 SAMPLE COLLECTION

Two, one (1) liter samples will be obtained (if drum volume permits) from each non-RCRA empty drum. One sample will be used for compatibility testing for the drummed waste. The second sample will be archived for use in preparation of composite samples of like materials for waste disposal characterization, if needed.

When sampling liquids in a drum, the drum will be positioned so that the bung is up (drums with the bung on the end will be positioned upright; drums with bungs on the side will be laid on its side with the bungs up). The contents of the drum will be allowed to settle. The bung will be slowly opened with a non-sparking bung wrench, allowing gas pressure to release. The bung will be removed and a sample collected through the bung hole. Open-head drums will require removal of the drum lid prior to sampling.

Liquids will be sampled using a clean, dedicated glass thief. Sludges and viscous materials will be handled as a liquid, if possible; however this may not be practical for sludges with large amounts of coarse or compacted materials. In this case, the drum will be opened and sampled with a sampling trier, soil auger, trowel or scoop. Solids will also be sampled using one of these devices. Spent sampling equipment and PPE, if needed, will be allowed to remain in the drum following sampling.

6.3 COMPATIBILITY ANALYSES

Compatibility analyses will be conducted for those drums designated as unknown or if additional information is required to sort the drums into compatible groups for disposal. The tests will be conducted on one of the 1 liter samples discussed in Section 6.2.2. Proposed compatibility analyses to be conducted for each drum are discussed in Appendix B and will occur at an offsite laboratory. These proposed tests may be reviewed further as the project continues and may be modified to as needed based on materials encountered.

The following compatibility tests will be conducted as described in Appendix B:

- Air Reactivity;
- Phase Determination;
- Flame Ignitability;
- Beilstein's Test;
- Water Solubility and Reactivity;
- Hexane Solubility;
- Inorganic Oxidizers;
- Peroxides;
- PH;
- Sulfide and Cyanide.

6.4 DRUM CHARACTERIZATION

Drum characterization sampling for disposal is subject to the requirements of the disposal facilities. Frequency and analysis parameters will be determined in conjunction with the disposal facilities. Additional sampling may also be conducted during field activities should unexpected wastes be encountered.

6.4.1 SAMPLING FREQUENCY

For each group of like wastes (i.e., oils, paints, etc.), or unknown materials which are sampled at the Sampling Area, the second (1) liter sample discussed in Section 6.2.2 will be composited and analyzed at the offsite laboratory. It is expected that up to (10) ten archived samples will be combined into one composite sample; however, this may be based on disposal facility requirements.

6.4.2 Sample Analysis

Analysis parameters will be as specified in the SAP, or may be determined based upon disposal facility requirements. When possible, generator knowledge such as historic data or contents' labeling will be utilized in lieu of or in conjunction with characterization samples. It is expected that full characterization sample analysis will include: ignitability (i.e., flash point), corrosivity (as pH), reactivity (Cyanide/Sulfide) and Toxicity Characteristic Leaching Procedure (TCLP) VOCs, Metals, Herbicides and Pesticides and SVOCs and total PCBs. Asbestos analysis will not be conducted for all samples as generator knowledge indicates that only select materials are suspected ACM

and those materials will be sampled separately.

Analysis will be conducted at an approved off-site laboratory per the Site SAP.

7.0 BULKING AND TRANSPORTATION

This section discusses bulking and the preparation for transportation of drummed waste materials. Specifics of offsite transport and disposal facilities are discussed in the Waste Management, Transportation and Disposal (WMT&D) Plan, submitted under separate cover.

7.1 BULKING

If practical, safe and cost effective, bulking of wastes will be conducted in the DAS for like-materials destined for the same disposal facility. The decision to bulk waste materials instead of disposal of waste in the original drum or as an overpacked waste will be evaluated during field activities based upon the drum condition, the type of waste, the ease of waste removal, disposal facility requirements and cost. If drums are not DOT-shippable, and waste can not be bulk consolidated, the drums will require overpacking prior to shipping.

All drums will be opened and inspected to confirm their contents against their inventory sheet and ID Number prior to bulking. If the drum does not contain the expected contents based on visual inspection, it will remain in the DSA for retesting for compatibility and/or characterization sampling prior disposal with the appropriate waste group. Bulking will be conducted by placing drums containing wastes directly into a transport vehicle, emptying wastes directly into a transport vehicle, or emptying wastes into a stockpile prior to loading into a transport vehicle. The method of bulking is subject

to disposal facility requirements, cost and site operational feasibility and will be determined during field activities.

Where possible, empty drums will be decontaminated until RCRA-empty and recycled off-site. If decontamination of drums is not feasible due to waste properties (i.e., a sticky resin), drums may be crushed or sized and disposed with bulked waste materials, provided this is acceptable to the disposal facility.

7.2 ACM PREPARATION FOR DISPOSAL

Asbestos containing materials, if determined to be present, will be wetted and double-bagged at the source of generation by the asbestos subcontractor prior to disposal at an approved facility. Work activities will be conducted in accordance with applicable local, state and federal regulations including 40 CFR 61.150 and N.J.A.C. 7:26-2.12.

7.4 DRUM LABELING AND MARKING

Each drum or container will be labeled and marked in accordance with DOT shipping regulations per 49 CFR 173. This marking and labeling will include:

For Non-DOT Hazardous Drums -

A Non-Regulated Waste Label

Drum ID Number

Disposal Facility Approval Number

For DOT/RCRA Hazardous Drums -

A Hazardous Waste Label

(that includes Generator Name,

Contact Number, RQ Value, Proper

DOT Shipping Name, DOT ID

Number and Packing Group)

Hazardous Material(s) Labels

Drum ID Number

Disposal Facility Approval Number

For TSCA or RCRA/TSCA Drums -

A Hazardous Waste Label

(that includes Generator Name,

Contact Number, RQ Value, Proper

DOT Shipping Name, DOT ID

Number and Packing Group)

Hazardous Material(s) Labels

Drum ID Number

PCB Inventory N umber

Disposal Facility Approval Number

Bulked waste materials and van loads of drums will be subject to placarding and manifesting requirements as detailed in the WMT&D Plan.

7.5 TRANSPORATION METHODS

Bulked materials and shippable drums will be transported off-site using an appropriate transportation method such as dump truck, roll-off, box van or trailer.

Transportation will be provided by the disposal facilities or an approved transportation subcontractor. Selection of a transportation method will be made during field activities based on cost, feasibility, transport vehicle availability, and disposal facility requirements.

7.4 LOADING OF VEHICLES

Loading of transportation vehicles will occur within the DSA area using conventional equipment such as a forklift or drum dolly. Transport vehicle will be scheduled on an as-needed basis. Each transport vehicle will enter and exit the Site via the approved truck route. Upon arrival, each truck will be inspected for acceptance prior to loading. All permitting and licensing information and driver documentation will be checked prior to release form site.

Each drum or bulked load will be weighed prior to shipment at the site scale. If needed, materials will be removed or added to the bulk transport vehicle following weighing if needed to ensure loads do not exceed the vehicle maximum allowable permit weight.

7.5 TRANSPORTATION ROUTES

Transportation of hazardous and non-hazardous wastes will be conducted in accordance with applicable state, local and federal regulations including 49 CFR 170 to 178, and 40 CFR 263, 264 and 265. Traffic routes and accident/incident emergency procedures will be identified in the WMT&D Plan. CERCLA Notification of local for impending shipments or shipment periods and procedures for securing the necessary routes will be coordinated by Sevenson's Transportation Coordinator for the Project.

7.6 RECORD KEEPING

In addition to field observation logs for each drum, records will be maintained for transportation shipments as required by state, local and federal regulations. A hazardous waste manifest will accompany each load of hazardous waste. A non-hazardous bill-of-lading will accompany each load of non-hazardous waste. A sample manifest and bill-of-lading are included in the WMT&D Plan.

8.0 OFF-SITE DISPOSAL

Following sampling, characterization, bulking and disposal facility approval, all drums and/or their contents will be sent off-site for disposal or recycling. All disposal facilities will be subject to CERCLA notification requirements. No facilities that have not been pre-authorized by USACE via this process will be utilized

8.1 HAZARDOUS WASTE DISPOSAL

Wastes which are characteristically hazardous as defined in 40 CFR 261, TSCA regulated, or both, will be transported to a permitted and approved hazardous waste (Subtitle C) facility for treatment and disposal.

8.2 NON-HAZARDOUS WASTE DISPOSAL

Wastes which are not hazardous as defined in 40 CFR 261 or TSCA regulated will be transported to a permitted and approved non-hazardous waste (Subtitle D) facility for disposal.

APPENDIX A

FORMS

DRUM INVENTORY SHEET

Project Nan	ne: Cornell Dubili	er Superfund Site	<u>Cluster N</u>	<u>umber:</u>
Job Number	r:	SAMPLE NUMBER:		
Container	Location:			
Container	^r Information	Туре:		
Size:	·	_		
Physical Appeara		Structural Integrity		
		Contents		
Content I	nformation	·		
Volume	Phase(s)			
Color	Clarity	Viscosity		
PID/OVA Readin	·			
NOTES:			·	
******			·	
		•		

Insert Drum Characterization Form

APPENDIX B

HAZCAT TESTING PROTOCOLS

Scope of Procedures for the Hazardous Compatibility Testing of Drummed Materials.

1.0 Drum Waste Compatibility Testing

1.1 Air Reactivity

Visual observation is made when a sample is first opened for any type of reaction, (fuming, bubbling)

1.2 Phase Determination

Determination of phase by visual observation. Sample is solid, liquid or mixture of both. If a sample has a mixture, a percentage to equal 100% is given to each phase.

2.0 General Liquid Compatibility

- 2.1 Flame Ignitability Determination is made using a Pensky-Martin closed cup tester or another compatible closed cup tester.
- 2.1.1 5 ml of sample is added to a testing cup of a closed cup tester.
- 2.1.2 Closed cup tester is heated
- 2.1.3 Flame is added to the closed cup sample at intervals of 5 °F.
- 2.1.4 Observation is made and temperature is recorded at which flash occurs.
- 2.1.5 If temperature reaches 200 °F, test is concluded and flashpoint of >200 °F is recorded.
- 2.2 Beilsteins Test Test to determine whether halogens are present within a sample.
- 2.2.1 The tip of a copper wire is bent into a small coil.
- 2.2.2 The coil is held over flame to ensure that the wire will not melt and that any impurities are destroyed.
- 2.2.3 The wire is cooled
- 2.2.4 The coil is dipped into a small amount of waste, then held at the edge of a flame.
- 2.2.5 Flame color is observed, any green color is indicative of a halogen present in the sample. (Chlorine, Bromine, Fluorine, iodine).
- 2.2.6 The coil is held near the flame until all of the sample melts, is burned away, or evaporates.
- 2.2.7 Test result is recorded as either + (positive) or (negative).
- **2.3 Water Reactivity and Solubility -** Determination of whether a waste is soluble, insoluble or reactive with water.
- 2.3.1 Five milliliters of distilled water are added to a test tube.
- 2.3.2 Several drops of waste are placed into the test tube containing the water.
- 2.3.3 Any reactions are observed. These may be noted as gas generation, heat generation or combustion.

 These test result is recorded as either + (positive) or (negative), along with the type of reaction.
- 2.3.4 Water soluble properties are observed. Organic solvents will form a distinctly separate layer from the water and will be recorded as (negative).
- 2.3.5 An aqueous waste will form a single phase in the test tube and will be recorded as + (positive).
- 2.4 Hexane Solubility Determination of whether a waste is soluble or insoluble in hexane.
- 2.4.1 Five milliliters of hexane are added to a test tube.
- 2.4.2 Several drops of waste are placed into the test tube containing the hexane.
- 2.4.3 Hexane solubility properties are observed. Organic solvents will from a single phase in hexane and will be recorded as + (positive). Wastes that are insoluble in hexane will be recorded as (negative).

3.0 Inorganic and Organic liquid compatibility.

- 3.1 Oxidizers The presence of oxidizers are tested using potassium iodide (KI) / starch paper.
- 3.1.1 A drop of waste is placed on KI / starch paper.
- 3.1.2 Color change on the paper is observed. A purple stain will indicate the presence of an oxidizer and will be recorded as + (positive).
- 3.1.3 If no purple stain appears after two minutes, no oxidizer is present and will be recorded as (negative). Many wastes are dark and cause dark staining on the KI paper. In this case the edges of the KI paper must be studied closely for observation of staining.
- 3.1.4 Strong acids and bases may cause a brownish staining. When this happens, the KI paper must be moistened with a buffer solution of sodium acetate cryohydrate and acetic acid, the test is then repeated.
- 3.2 Peroxides The presence of peroxides is tested using peroxide test paper.
- 3.2.1 Peroxide test paper is placed in a one milliliter solution of sample for five seconds.
- 3.2.2 If necessary, prior to testing, pH of a sample will be adjusted using to a range between 2-12 by slowly adding either drops of NaOH to raise the pH, or H₂SO₄ to lower the pH.
- 3.2.3 A blue stain will indicate the presence of a peroxide and will be recorded as + (positive). The darker the blue stain appears, the stronger the concentration of peroxides.
- 3.2.4 If no blue staining occurs after two minutes, no peroxides are present and the result will be recorded as (negative).

4.0 Organic Liquid Compatibility

- **4.1 Volatile Vapor measurement** The presence of volatile vapors is tested for by using an organic vapor monitor or combustible gas meter.
- 4.1.1 Sample jar is secured beneath a fume hood.
- 4.1.2 The lid of the sample jar is opened and held over the jar.
- 4.1.3 The tip or wand of the gas meter is placed within the headspace of the jar.
- 4.1.4 A recording is made of the maximum concentration of volatile gases detected.
- **4.2 Oxidizers** The presence of oxidizers are tested for using the same method as described above in secton 3.1
- 4.3 Peroxides The presence of peroxides is tested for using the same method as described in section 3.2
- 4.4 pH The pH of a sample is determined using pH test paper.
- 4.4.1 Two milliliters of distilled water are placed in a test tube.
- 4.4.2 Two milliliters of sample are placed in the test tube with the water and the solution is mixed.
- 4.4.3 A drop of this solution is placed onto a strip of pH test paper.
- 4.4.4 The color change of the pH test paper is compared to the pH key provided on the pH test paper packet, and a determination of pH is made.
- 4.4.5 The pH result is recorded.
- 4.5 Sulfide Testing The presence of sulfide is tested for using lead acetate paper.
- 4.5.1 A strip of lead acetate paper is moistened with a sodium acetate cryohydrate buffer solution.
- 4.5.2 A drop of sample is placed on the lead acetate paper.
- 4.5.3 Observations are made and if a black stain appears on the paper, sulfide is present and a + (positive) notation is recorded.

- 4.6 Cyanide Testing The presence of Cyanide is tested for using a cyanide Draeger ion detector tube.
- 4.6.1 Cyanide ion detector tube is broken and placed into the Draeger tube hand pump.
- 4.6.2 Pump is operated according to directions specified by Draeger and air is sampled from the headsace of the sample container.
- 4.6.3 Observations within the tube are made.
- 4.6.4 Color change within the tube will indicate the presence of Cyanide and the concentration will be recorded as it is shown on the graduated test tube.

5.0 Solids Characterization

- **5.1 Volatile Vapor measurement** The presence of volatile vapors is tested for by using an organic vapor monitor or combustible gas meter.
- 5.1.1 Sample jar is secured beneath a fume hood.
- 5.1.2 The lid of the sample jar is opened and held over the jar.
- 5.1.3 The tip or wand of the gas meter is placed within the headspace of the jar.
- 5.1.4 A recording is made of the maximum concentration of volatile gases detected.
- 5.2 Ignitibility The ease of ignitibility of a solid is tested.
- 5.2.1 The tip of a copper wire is bent into a small coil.
- 5.2.2 The coil is held over flame to ensure that the wire will not melt and that any impurities are destroyed.
- 5.2.3 The wire is cooled.
- 5.2.4 A BB-sized portion of the sample is collected on the wire coil.
- 5.2.5 The wire coil is placed into the flame and observations are made.
- 5.2.6 Samples that do not ignite or burn only while in the flame, will be designated as having a (negative) result.
- 5.2.7 Samples that do ignite and burn vigorously, will be designated as having a + (positive) result.

NOTE: This test may be supplemented by performing Method 1030, Ignitibility of Solids. A copy of this test method is included at the end of these procedures.

- 5.3 Beilsteins Test Test to determine whether halogens are present within a sample.
- 5.3.1 The tip of a copper wire is bent into a small coil.
- 5.3.2 The coil is held over flame to ensure that the wire will not melt and that any impurities are destroyed.
- 5.3.3 The wire is cooled
- 5.3.4 A BB-sized portion of the sample is collected on the wire coil.
- 5.3.5 The wire coil is placed into the flame and observations are made.
- 5.3.6 Flame color is observed, any green color is indicative of a halogen present in the sample. (Chlorine, Bromine, Fluorine, iodine).
- 5.3.7 The coil is held near the flame until all of the sample melts, is burned away, or evaporates.
- 5.3.8 Test result is recorded as either + (positive) or (negative).
- **5.4 Water Reactivity and Solubility -** Determination of whether a waste is soluble, insoluble or reactive with water.
- 5.4.1 Five milliliters of distilled water are added to a test tube.
- 5.4.2 A BB-sized portion of waste is placed into the test tube containing the water.
- 5.4.3 Any reactions are observed. These may be noted as gas generation, heat generation or combustion.

 These test result is recorded as either + (positive) or (negative), along with the type of reaction.
- 5.4.4 Sample is mixed thoroughly.
- 5.4.5 Observations of the samples solubility will be made and recorded as (insoluble), partial, or (+soluble).

- 5.5 Hexane Solubility Determination of whether a waste is soluble or insoluble in hexane.
- 5.5.1 Five milliliters of hexane are added to a test tube.
- 5.5.2 A BB-sized portion of waste is placed into the test tube containing the hexane.
- 5.5.3 Hexane solubility properties are observed and recorded as (insoluble), partial, or + (soluble).
- 5.6 Oxidizers The presence of oxidizers are tested using potassium iodide (KI) / starch paper.
- 5.6.1 Five milliliters of distilled water are added to a test tube.
- 5.6.2 A BB-sized portion of waste is placed into the test tube containing the water and the water is thoroughly mixed.
- 5.6.3 A drop of the mixture is placed on KI / starch paper.
- 5.6.4 Color change on the paper is observed. A purple stain will indicate the presence of an oxidizer and will be recorded as + (positive).
- 5.6.5 If no purple stain appears after two minutes, no oxidizer is present and will be recorded as (negative). Many wastes are dark and cause dark staining on the KI paper. In this case the edges of the KI paper must be studied closely for observation of staining.
- 5.6.6 Strong acids and bases may cause a brownish staining. When this happens, the KI paper must be moistened with a buffer solution of sodium acetate cryohydrate and acetic acid, the test is then repeated.
- 5.7 Peroxides The presence of peroxides is tested using peroxide test paper.
- 5.7.1 Five milliliters of distilled water are added to a test tube.
- 5.7.2 A BB-sized portion of waste is placed into the test tube containing the water and the water is thoroughly mixed.
- 5.7.3 If necessary, prior to testing, pH of a sample will be adjusted using to a range between 2-12 by slowly adding either drops of NaOH to raise the pH, or H₂SO₄ to lower the pH.
- 5.7.4 A blue stain will indicate the presence of a peroxide and will be recorded as + (positive). The darker the blue stain appears, the stronger the concentration of peroxides.
- 5.7.5 If no blue staining occurs after two minutes, no peroxides are present and the result will be recorded as (negative).
- 5.8 Sulfide Testing The presence of sulfide is tested for using lead acetate paper.
- 5.8.1 Five milliliters of distilled water are added to a test tube.
- 5.8.2 A BB-sized portion of waste is placed into the test tube containing the water and the water is thoroughly mixed.
- 5.8.3 A strip of lead acetate paper is moistened with a sodium acetate cryohydrate buffer solution.
- 5.8.4 A drop of sample is placed on the lead acetate paper.
- 5.8.5 Observations are made and if a black stain appears on the paper, sulfide is present and a + (positive) notation is recorded. If no black stain appears, a (negative) notation is recorded.
- 5.9 Cyanide Testing The presence of Cyanide is tested for using a cyanide Draeger ion detector tube.
- 5.9.1 Cyanide ion detector tube is broken and placed into the Draeger tube hand pump.
- 5.9.2 Pump is operated according to directions specified by Draeger and and air is sampled from the headspace of the sample container.
- 5.9.3 Observations within the tube are made.
- 5.9.4 Color change within the tube will indicate the presence of Cyanide and the concentration will be recorded as it is shown on the graduated test tube.

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE				<u>D</u> ,	DATE:		TRAN	TRANSMITTAL NO.			
(Read Instructions on the reverse side prior to initiating this form)					Thursday 30, 2006			27			
Section	Section 1 REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be initiated by the contractor)										
TO: USACE Service Notice of the Control of the Cont			nmental Services, Inc.	CONTRACT NO.: W912DQ-04-D-0		•	3	,	X This is a New Submittal Rebsubmittal of		
	Patrick Nejand 333 Hamilton Blvd.	2749 Lockport Rd.				Order # 0005			Transmittal No		
· · · · · · · · · · · · · · · · · · ·		Niagara Falls, NY	14305						Check One: This Transmittel is for FIOX_Gov't Approval		
SPECIFICATION SEC. NO. (Cover only one section with each transmittal)			PROJECT TITLE AND LOCATION:								
01525			Cornell-Dubilier Electronics Superfund Site OU2					South Plainfield, NJ			
ITEM DESCRIPTION OF ITEMS SUBINO. (Type, size, model number, etc.)			MFG. OR CONTR. CAT., CURVE DRAWING OR BROCHURE NO.		COI	CONTRACT REFERENCE DOCUMENT		For Contracto r Use	VARIATIONS (See instruction	FOR CE USE CODE	
						SPEC. DRAWING RA. NO. SHEET NO.			No. 6)		
а	. b .		с.	d.	e.		f.	g.	h.	i.	
1	1 Workers and Community Protection Plan			6	1.3			Α			
1 copy fo	r N. Kolb, USACE, Project Field Office r E. Urbanik, USACE N. Resident C r P. Mannino, USEPA Project Mana	Office, NY District, 214 Sta	ate Highway 18 N, E. Brunswick, I	NJ 08816 th Plaifield, NJ 07	080	are correct Specification	t the above submitte and in strict conform ans except as otherw Zambrana, SES IE AND SIGNAT	nance with the rise stated.	Contract Drawing		
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INCLOSURES RETURNED (List by Item No.) NAME, TITLE AND SIGNATURE OF APPROVING AUTHORITY							DATE				
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4.

Workers and Community Protection Plan

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 30, 2006

MEMORANDUM

To:

Al LaGreca, Kim Lickfield

From:

Paul Hitcho PH

Date:

November 28, 2006

Subject:

Worker and Community Protection Program - Cornell-Dubilier Site

After review of the PCB chemical data for the Cornell-Dubilier Site, it is my professional opinion that the goals of both worker and community PCB protection programs can be best achieved using real-time dust monitoring in conjunction with effective dust control practices will control potential worker and community PCB exposure.

This conclusion is based on the following:

- Under normal ambient conditions, PCBs have a low vapor pressure and a high
 affinity to adsorp onto non-polar surfaces, such as soil particles. Therefore, the
 highest potential airborne exposure resulting from PCB contamination at this site
 would result from exposure to contaminated soil and dust. Effectively controlling
 airborne dusts will, therefore, control potential PCB exposure.
- Of 71 total samples 18 paint chip, 7 window caulking, and 1 wood were found to have PCB concentrations greater than 50 mg/kg, the remediation action level for this site.
 - The greatest number of PCB samples above 50 mg/kg were found in Cluster 1. The results range from 53 to 52,000 mg/kg for the 11 samples. However, 10 of the samples were below 600 mg/kg with a mean of approximately 200 mg/kg.
 - Clusters 4, 8, 9, 11, and 12 had PCB concentrations below the 50 mg/kg.
 - Cluster 2 had a mean concentration of 185 mg/kg; Cluster 3 280 mg/kg; Cluster 5 173 mg/kg; Cluster 6 120 mg/kg (1 sample); and Cluster 7 107 mg/kg. (Note only samples >50 mg/kg were used to compute the mean.)
- Of 87 total core samples, 14 contained PCB above 50 mg/kg.

The greatest number of PCB samples >50 mg/kg was again in Cluster 1 with a range from 82 to 1,400 mg/kg (5 samples).

Clusters 2, 6, 8, 9, 10, 11, and 12 had PCB concentrations below the

50 mg/kg.

- Cluster 1 had a mean concentration of 916 mg/kg (5 samples); Cluster 3 110 mg/kg (1 sample); Cluster 5 81 mg/kg (2 samples); and Cluster 7 465 mg/kg (2 samples). (Note only samples >50 mg/kg were used in computing the mean.)
- As stated in the contract specifications, the Permissible Exposure Limit (PEL) for PCBs is 3.1 E-08 lb/cubic foot (Paragraph 3.1.5 of Section 13284) or 0.5 mg/m³ (Chlorodiphenyl containing 54% Chlorine or Arochlor 1254 – Table Z-1 of 29 CFR 1910.1000).
 - An action level for dust can be calculated using the PEL for the contaminant of concern and its soil concentration or:

Dust Action Level =
$$\frac{(1 \text{ E+6})(\text{PEL})}{(\text{Contaminant Concentration})}$$

As a factor of safety the highest reported PCB concentration is used. This calculates as follows:

Dust Action Level =
$$(1 E+6)(0.5 \text{ mg/m}^3)$$
 = 9.62 mg/m³
(52,000 mg/kg)

- This means that for a worker to be exposed above the PEL from particulate containing (52,000 mg/kg of PCB), an exposure at 9.62 mg/m³ of airborne particulate for eight hours would have to occur.
- However, it is likely that potential time-weighted exposures will correlate better with the mean concentrations. This would result in a real-time particulate action level that is substantially higher e.g., using the Cluster 1 core sample mean, the action level would be 543.85 mg/m³.
- The Site Safety and Health Plan has provisions that will protect both the worker and community in regard to PCB exposure. These include:
 - Initial Levels of Protection
 - Real time particulate monitoring (Work zone and perimeter)
 - Personal air monitoring for PCB
 - Particulate Action Levels 2.5 mg/m³ for upgrade to Level C and a perimeter action level of 150 ug/m³ for the implementation of dust control measures.

Based upon the reported PCB contaminant concentrations, above calculations, and rationale; an occupational health and community protection program based upon real time particulate monitoring, prescribed action levels, and implementation of dust control procedures will provide the required protection. In addition, our experience at similar sites has shown that we can effectively control dust emission from the site to levels significantly lower than the action levels.

TRANSMITTAL OF SHOP DRAWINGS, EQUIPMENT DATA, MATERIAL SAMPLES, OR MANUFACTURER'S CERTIFICATES OF COMPLIANCE (Read Instructions on the reverse side prior to initiating this form)					₽	DATE: December 4, 2006			TRANSMITTAL NO. 28		
Section 1 REQUEST FOR APPROVAL OF THE FOLLOWING ITEMS (This section will be											
TO: FROM:		nmental Services, Inc. W91 Tas		Г NO.				X This is a New Submittal Rebsubmittal of Transmittal No Check One: This Transmittal is for FIO X Gov't Approval			
SPECIFICATION SEC. NO. (Cover only one section with each transmittal)			PROJECT TITLE AND LOCATION:								
01525			Cornell-Dubilier Electronics Superfund Site OU2 South Plainfield, NJ							LN	
. ITEM NO.			MFG. OR CONTR. CAT., CURVE DRAWING OR	NO. OF COPIES	co	NTRACT R	EFERENCE MENT	For Contracto r Use	VARIATIONS (See instruction No. 6)	FOR CE USE CODE	
			BROCHURE NO. (See instruction No. 8)			SPEC. DRAWING SHEET NO.					
a.	b.		c.	d.		e. <i>f</i> .		g.	h.	i.	
1	Health and Safety Plan - Worker and Community PCB Protection Plan - Cluster 12			6		1.3		Α			
REMARKS: 1 copy for N. Kolb, USACE, Project Field Office, 26 Rustic Mall, Manville, NJ 08835 1 copy for E. Urbanik, USACE N. Resident Office, NY District, 214 State Highway 18 N, E. Brunswick, NJ 08816 1 copy for P. Mannino, USEPA Project Manager, Region 2, Project Field Office, 333 Hamilton Blvd, South Plaifield, NJ 07080 c.cSES- File I certify that the above submitted items have been reviewed in detail and are correct and in strict conformance with the Contract Drawings and Specifications except as otherwise stated. William Zambrana, SES NAME AND SIGNATURE OF CONTRACTOR											
Section II APPROVAL ACTION											
INCLOSU	RES RETURNED (List by Item No	D SIGNATURE OF APPROVING AUTHORITY				DATE					
ENG FOR	RM 4025, March 95 (E	R 415-1-10) EDITION	OF Sept 93 IS OBSOLETE		7.			SHE	ET _1_ OF	1	

Health and Safety Plan Workers and Community PCB Protection Plan

Workers and Community i CD i relection i lai

Cornell - Dubilier Electronics Superfund Site Middlesex County, New Jersey

Prepared For:

U.S. Army Corps of Engineers

USACE Contract Number - W912DQ-04-D-0023 Task Order - 0005 Operating Unit 2

Prepared By:

Sevenson Environmental Services, Inc. 2749 Lockport Road Niagara Falls, New York 14305

November 30, 2006

Worker and Community PCB Protection Plan - Cluster 12

Aroclor–1254 has been detected in a paint chip sample at a concentration of 22 mg/kg. Based upon this concentration the hazard to both the worker and community are minimal. However, the provisions of the Site Safety and Health Plan will be followed. The sections for prevention of PCB exposure to the worker and community include:

- Levels of Protection Section 6.3
- Exposure Monitoring / Air Sampling Program Section 7.0
- Implementation of dust control methods Table 8 (Operational Action Levels)

In addition a separate dust control plan has been written and will be implemented, as necessary.

Asbestos Work Plan Revision 1

for

Cornell – Dubilier Electronic Superfund Site 333 Hamilton Boulevard South Plainfield, New Jersey 07080

Prepared for:

Sevenson Environmental Services

December 11, 2006

Prepared by:

Assessment Resources & Technologies, Inc.

111 John Street; Suite 538 New York, New York 10038 (212) 785-0266 fax (212) 785-0234

Revision:

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Appendix A – PAL Environmental Submittals

Appendix B – Assessment Resources & Technologies, Inc. Submittals

U.S. Army Corps of Engineers

Asbestos Removal and Disposal Section 02080

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1.0 REFERENCES

The publications listed below form a part of this specification to the extent referenced. The publications are referred to within the text by the basic designation only.

1.1 AMERICAN NATIONAL STANDARDS INSTITUTE (ANSI)

a. ANSI Z87.1

(2003) Standard for Occupational and Educational Eye and Face

Protection

b. ANSI Z88.2

(1992) Respiratory Protection

c. ANSI Z9.2

(2001) Fundamentals Governing the Design and Operation of

Local Exhaust Ventilation Systems

1.2 ASTM INTERNATIONAL (ASTM)

a. ASTM D 1331

(1989; R 2001) Surface and Interfacial Tension of Solutions of

Surface-Active Agents

b. ASTM D 4397

(2002) Polyethylene Sheeting for Construction, Industrial, and

Agricultural Applications

c. ASTM E 1368

(2003) Visual Inspection of Asbestos Abatement Projects

1.3 COMPRESSED GAS ASSOCIATION (CGA)

a. CGA G-7

(2003) Compressed Air for Human Respiration

1.4 NATIONAL FIRE PROTECTION ASSOCIATION (NFPA)

a. NFPA 701

(2004) Fire Tests for Flame Propagation of Textiles and Films

1.5 NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH (NIOSH)

a. NIOSH 94-113

(1994; 4th Ed) NIOSI-I Manual of Analytical Methods

1.6 NEW JERSEY ADMINISTRATIVE CODE (NJAC)

a. NJAC 5:16

Asbestos Licenses and Permits

b. NJAC 5:23-8

(2000) Asbestos Hazard Abatement Sub code

c. NJAC 7:26-1 et seq.

(2002) Solid Waste Regulations – Asbestos

d. NJAC 7:26C-1 et seq. (2003) Hazardous Waste Regulations

1.7 NEW JERSEY STATUTES ANNOTATED (NJSA)

a. NJSA 34:5A-32 et seq. The Asbestos Control and Licensing Act

1.8 U.S. ARMY CORPS OF ENGINEERS (USACE)

a. EM 385-1-1

(2003) Safety -- Safety and Health Requirements

b. EP 1110-1-11

(1992) Asbestos Abatement Guideline Detail Sheets

1.9 U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

EPA 340/1-90/018

(1990) Asbestos/NESHAP Regulated Asbestos Containing

Materials Guidance

1.10 U.S. NATIONAL ARCHIVES AND RECORDS ADMINISTRATION (NARA)

a. 29 CFR 1910.134

Respiratory Protection

b. 29 CFR 1910.141

Sanitation

c. 29 CFR 1910.147

Control of Hazardous Energy (Lock Out/Tag Out)

d. 29 CFR 1926.1101

Asbestos

e. 29 CFR 1926.32

Safety and Health Regulations for Construction - Definition

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f.	40 CER 61	National Emission Standards for Hazardous Air Pollutants
g.	40CFR	763 Asbestos
ĥ.	42CFR	84 Approval of Respiratory Protective Devices
i.	49CFR	107 Hazardous Materials Program Procedures
j.	49 CFR 171	General Information, Regulations, and Definitions
k.	49 CFR 172	Hazardous Materials Table, Special Provisions, Hazardous
		Materials Communications, Emergency Response Information, and Training Requirements
ì.	49 CFR 173	Shippers - General Requirements for Shipments and

1.11

UNDERWRITERS LABORATORIES (UL)
a. UL 586 (1996; Rev thru Apr 2000) High-Efficiency, Particulate, Air Filter Units

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2. SCOPE OF WORK

PAL Environmental Corp. will:

A. Abate approximately 2 Linear Feet of friable pipe insulation attached to an empty oil tank 333 Hamilton Boulevard, South Plainfield, New Jersey.

- B. Has provided the "Abatement Plan" as provided in Appendix A.
- C. Will furnish all labor, supervision, materials, services, insurance, equipment, and tools necessary for the complete and proper execution of all work of this section.
- D. All asbestos removal and decontamination will be performed in accordance with the guidelines and regulations of the responsible state agencies: New Jersey Department of Labor (DOL), Occupational Safety and Health Administration (OSHA), New Jersey Department of Health (DOH), New Jersey Department of Community Affairs (DCA) and the New Jersey Department of Environmental Protection (DEP).
- E. Will assume full responsibility and liability for the compliance with all applicable Federal, State, and Local regulations pertaining to work practices, handling, hauling and disposal of asbestos containing materials and asbestos containing waste. PAL Environmental Corp. is responsible for providing medical examinations and maintaining medical records of personnel as required by the applicable Federal, State, and Local regulations. PAL Environmental Corp. will hold the Owner and the Owner's Representative harmless for failure to comply with any applicable work, hauling, disposal, safety, health or other regulation on the part of himself/herself, his/her employees, or his/her subcontractors.
- F. Except to the extent that more explicit or more stringent requirements are written directly into the contract documents, all applicable codes, regulations, and standards have the same force and effect (and are made a part of the contract documents by reference) as if copied directly into the contract documents, or as if published copies are bound herewith.
- G. Strictly adhere to all precautions necessary for the safety and health of the work person in accordance with provisions of OSHA Standards, 26 Code of Federal Registers C.F.R., Part 1926.58 Constructions Standards, and Section 1910.1001, Industry Standards.
- H. Limit use of the premises to the work indicated.
- I. Properly contain, transport, and dispose of all contaminated wastes and materials at a site approved for asbestos disposal. The dumpster may be stored on-site as per the Building Owner/Owner's Representative. The dumpster will be completely enclosed and locked.
- J. Furnish, install, and maintain for the duration of the project all precautions necessary for the safety, health, and welfare of the work person and building occupants.
- K. Furnish, install, and maintain for the duration of the project all methods and systems necessary to prevent the escape of airborne asbestos fibers to adjacent areas of the building or the outside

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atmosphere.

L. Clean, dismantle, remove, and replace all items and equipment which should be moved prior to asbestos cleanup.

M. Provide a written report at end of abatement project certifying ambient air conditions in the workplace meet applicable indoor air quality standards.

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3.0 NOTIFICATIONS and DEFINITIONS

3.1 PAL Environmental Corp. will notify the following agencies in writing 10 days prior to the start of an asbestos removal project. The written notice will include the following: a copy of the completed application for a construction permit for asbestos abatement, a copy of the permit if the administrative authority is a municipal enforcing agency and not the department (N.J.A.C. 5:23-8.6 g).

- a. Mr. Bob Fritzpatrick
 USEPA Air Compliance Branch
 290 Broadway
 New York, New York 10007-1866
 (212) 637-4042
- b. New Jersey Department of Community Affairs
 Asbestos Contractor/Worker Program
 PO Box 816
 Trenton, NJ 08625-0816
 (609) 984-5508
 (609) 633-2158
- New Jersey Department of Labor
 Office of Asbestos Control and Licensing
 28 Yard Avenue, Station Plaza 4
 Trenton, New Jersey 08625-0360
- d. New Jersey Department of Health Asbestos Control Service.
 CN 360
 Trenton, New Jersey 08625-0360
- 3.1.1 This notification will include the following information:
 - a. Name and address of Contractor.
 - b. Address and description of the building, including size, age, and prior use of the building or area, the amount of friable asbestos material present (square feet). Designated room numbers or other location information unless entire building is involved.
 - c. Scheduled starting and completion dates for removal.
 - d. Procedures and equipment (including ventilation systems) that will be employed to comply with the C.F.R., Title 40, Part 61 of the United States Environmental Protection Agency.
 - e. The name and address of the carting company and of the waste disposal site where the asbestos waste will be deposited.
 - f. The name and address of the testing laboratory who will perform the required analysis, the name and address of the air monitoring firm and the Industrial Hygiene Technician working on behalf of the Owner, and the name and address of the testing laboratory who will perform OSHA compliance air monitoring on behalf of PAL Environmental Corp..

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3.2 PAL Environmental Corp. will notify the following agency in writing ten (10) days prior to the removal and the disposal of asbestos waste from the job site. All asbestos waste materials destined for disposal will be in accordance with 40 C.F.R. 61.20 -25 before it can be legally transported and disposed of.

New Jersey Department of Environmental Protection Division of Hazardous Waste Management Twin River Professional Building East Windsor, New Jersey 08520

- 3.2.1 The notification will include the following
 - a. Name, address, and telephone number of the removal location.
 - b. Quantity in cubic yards and nature of the waste to be disposed (I.D. #27 for Asbestos).
 - c. Name, address, and New Jersey Department of Environmental Protection registration number of the collector-handler.
 - d. Name and address of the landfill at which disposal will occur.
 - e. Date and time of disposal.
 - f. A copy of any written notification required by 40 C.F.R. 61.22 to 61.25.

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4.0 PRE-ABATEMENT STATE REQUIREMENTS

- 4.1 It is unlawful to undertake a large asbestos hazard abatement job unless PAL Environmental Corp. first files an application in writing with the Administrative Authority having jurisdiction and obtains the required permit. This permit will serve as notice for public record in the office of the administrative authority having jurisdiction. All work will be monitored and controlled by the Industrial Hygiene Technician, who will advise the administrative authority having jurisdiction of its findings (N.J.A.C. 5:28-8.6a).
- 4.2 The application for a construction permit for asbestos abatement projects will include the following [N.J.A.C. 5:23-81.
 - a. The name, address and license number of the asbestos Contractor pursuant to N.J.A. C. 12:120 Asbestos Licenses and Permits under the jurisdiction of the New Jersey Department of Labor.
 - b. The asbestos hazard assessment prepared by the New Jersey Department of Health, County or local Health Department, or a private business entity, authorized by the New Jersey Department of Health unless the requirement for an assessment has been waived by any of the above.
 - c. The name and address of the private air monitoring firm hired by the Building Owner, who will act as the Asbestos Safety Control Monitor. They will be authorized by the New Jersey Department of Community Affairs and will be responsible for the continuous monitoring during the asbestos abatement project.
 - d. The name and address of the analytical testing laboratory approved by the New Jersey Department of Health.
 - e. The name and address of the New Jersey Department of Environmental Protection registered waste hauler, including the New Jersey Department of Environmental Protection Number and the New Jersey Department of Environmental Protection registered landfill, where the asbestos waste will be deposited.

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5.0 PROTECTIVE CLOTHING AND EQUIPMENT FOR ASBESTOS REMOVAL

- 5.1 Listed below are materials, equipment, and tools generally used in asbestos removal operations. It is not inferred, however, that all materials listed are necessarily required in every asbestos removal project and, in some instances, materials required to complete the work may not be listed.
 - a. Protective clothing. will be fire retardant manufactured of "Tyvek" by DuPont (or approved equal) consist of disposable full body coveralls, headcovers, and boots as required by the most stringent OSHA standards applicable to the work. Eye protection, hard hats, and gloves will be available.
 - b. Plastic Film: Provide a minimum; clear six (6) mil. in thickness polyethylene. The plastic sheeting will be taped securely in place or stapled or fastened by spray-on adhesives, glue beads, horizontal wood battens, or the equivalent.
 - 1. Walls two (2) layer of six (6) mil. polyethylene.
 - 2. Floors two (2) layers of six (6) mil. polyethylene.
 - c. Adhesives: Tape will be high quality tape (Asbestos tape, duct tape, or approved equal) in 2" or 3" widths with an adhesive formulated to aggressively stick.
 - d. Support Structures constructed of Polyvinyl Chloride Pipes (P.V.C.) and/or aluminum or wood studs.
 - e. Disposal bags will be six (6) mil. polyethylene bags of a sufficient size for the application. The bags will be printed with letters of sufficient size and contrast to be readily visible and legible. The label will state as a minimum:

Contains Asbestos Fibers Avoid Creating Dust Cancer and Lung Disease Hazard

5.2 Signs:

a. Provide Danger signs (14" x 20") red background, lettered in black. It will be displayed at all routes of access and all visual and physical barriers as follows as a minimum:

Danger Asbestos

Cancer and Lung Disease Hazard Authorized Personnel Only Respirators and Protective Clothing is Required in this Area

b. The sign will meet OSHA Standards 29 C.F.R. 1926.58 as follows;

LEGEND	NOTATION
Danger	1" Sans Serif Gothic or Block
Asbestos	1" Sans Serif Gothic or Block
Cancer and Lung Disease Hazard	3/4" Sans Serif Gothic or Block
Authorized Personnel Only	½" Gothic
Respirators and Protective Clothing is Required in this Area	1/4" Gothic

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c. At all areas of direct access to the work area (decontamination unit, etc.) display signs (10" x 14") yellow background, lettered in black as follows:

LEGEND	NOTATION			
No Food, Beverages or Tobacco Permitted	¾" Block			
All Persons Will Don Protective Clothing (Coverings) Before Entering the Work Area	¾" Block			
All Persons Will Shower immediately after leaving Work Area and Before Entering the Changing Area	¾" Block			

- 5.3 Amended water or removal encapsulant will be approved for the particular type and concentration of asbestos dealt with in each circumstance by the Project Manager.
 - a. Amended Water: Provide water to which a surfactant has been added. Use a mixture of surfactant and water which results in wetting of the material which equals or surpasses the wetting resulting from the use of one (1) ounce of a surfactant consisting of fifty percent (50%) polyoxyethylene ester and fifty percent (50%) polyoxyethylene ether mixed with five (5) gallons of water.
 - b. Removal Encapsulant: Provide a penetrating- type encapsulant designed specifically for removal of asbestos-containing material. Use a material which results in wetting of the asbestos-containing material and retardation of fiber release during disturbance of the material equal to or greater than that provided by amended water as described above.
 - 1. Encapsulant: Tinted which meets all fire and building codes
- 5.4 Filters of sufficient quantity and type (HEPA, etc.) for use in respirators and other equipment requiring filters.
 - a. Respirator protection will be in accordance with OSHA Regulation 1926-58 and ANSI Z88.2-1980. There will be NO EXCEPTIONS to these requirements.
 - b. Air Filtering Equipment capable of filtering asbestos fibers
 - c. HFPA Vacuum: High efficiency vacuum cleaners with special HEPA filtration to retain asbestos fibers, type "Nilfisk" #GA73 or "Pullman/Holt" #75 ASA (or approved equal).
 - d. Shower Head and Controls: Provide a factory made showerhead producing a spray of water, which can be adjusted for spray size and intensity. Feed shower with water mixed from hot and cold supply lines. Arrange so that control of water temperature, flow rate and shut off is from inside shower without outside aid.
 - e. Filters: Provide cascaded filter units on drain lines from showers or any other water source carrying asbestos-contaminated elements as indicated below. Connect so that discharged water passes primary filter and output of primary filter passes through secondary filter.

Primary Filter - Pass particles 20 microns and smaller.

Secondary Filter - Pass particles 5 microns and smaller.

f. Shower Stall: For Wash Down Station provide leak tight shower enclosure with integrated drain pan fabricated from fiberglass or other durable waterproof material, approximately 3' x 3' square with minimum 6' high sides and back. Structurally support as necessary for stability. Equip with hose bib, as specified in this section, mounted at approximately 4' - 0"

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above drain pan. Connect drain to a reservoir, pump water from reservoir through filters to a drain or store and use for amended water. Mount filters inside shower stall on back wall beneath hose bib.

- g.. Sump Pump: Provide totally submersible, waterproof sump pump with integral float switch. Provide unit sized to pump 2 times the flow capacity of all showers or hoses supplying water to the sump, through the filters specified herein when they are loaded to the extent that replacement is required. Provide unit capable of pumping debris, sand, plaster or other materials washed off during decontamination procedures without damage to mechanism of pump. Adjust float switch so that a minimum of 3" remains between top of liquid and top of sump pan.
- h. Lumber: Provide kiln-dried lumber of any grade or species.
- i. Scaffold: Provide all scaffolding and/or staging as necessary to accomplish the work of this contract
- k. Hand Tools: Hand tools of sufficient quantity to implement the work at hand and the work schedule submitted including ancillary materials (e.g. staples, nails, wire, etc.).
 - Spray Equipment: Spray equipment capable of mixing wetting agent with water and capable of generating sufficient pressure, volume, and having ample hose length to reach all areas of asbestos.
- 5.5 PAL Environmental Corp. will have available sufficient inventory of these materials and equipment to accomplish the job, protect the workers, and protect all authorized visitors to each facility.
 - In procuring all items in this work, it is PAL Environmental Corp.'s responsibility to verify the detailed requirements of this guideline and all codes, standards, and regulations to verify that the items procured for use in this work meet or exceed the specified requirements.
- 5.6 The Owner reserves the right to reject items incorporated into the work that fail to meet the requirements of this guideline or any applicable codes, standard or regulation.
- 5.7 The mention of any produce or manufacturer's name or equipment name does not imply endorsement by the Owner/ Owner's Representative or Project Manager.
- "Approved equal" or "equal" will mean as approved by the Owner/Owner's Representative or 5.8 Project Manager only. They will be the sole judge as to whether or not a substitute item is equal, and any item specified will be submitted for approval.

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6.0 RESPIRATORY PROTECTION

6.1 Powered Air-Purifying Respirators

- a. Powered air-purifying, positive pressure, full or half-face respirators will be worn during all phases of the project. At the discretion of the Certified Industrial Hygienist (CIH), full or half-face, negative pressure respirators may be worn during preparation and final cleaning. If air monitoring results show that fiber counts meet or exceed an action level defined as half (1/2) the respirator use limit concentration (20 f/cc), then Type "C" respirators will be used.
- b. Supply a sufficient quantity of high efficiency respirator filters approved for asbestos so that workers can change filters at any time that flow through the face piece decreases to the level at which the manufacturer recommends filter replacement. Require that HEPA elements in filter cartridges be protected from wetting during showering. Require entire exterior housing of respirator including blower unit, filter cartridges, hoses, battery pack, facemask, belt, and cord to be washed each time a worker leaves the work area. Caution should be used to avoid shorting battery pack during washing. Provide an extra battery pack for each respirator so that one can be charging while one is in use.
- c. Respirator Bodies: Provide half-face or full-face type respirators. Equip full-face respirators with a nose cup or other anti-fogging device as would be appropriate for use in air temperatures less than 32 degrees Fahrenheit.

6.2.1 Filter Cartridges.

Provide, at a minimum,

- > HEPA type filters labeled with NIOSH Certification for
 - o "Radionuclides, Radon Daughters, Dust, Fumes, Mists including Asbestos-Containing Dusts and Mists"
- > color coded in accordance with ANSI Z228.2 (1980).
- In addition, a chemical cartridge section may be added, if required, for solvents, etc., in use. In this case, provide cartridges that have each section of the combination canister labeled with the appropriate color code and NIOSH Certification.

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7.0 **CONSTRUCTION AIDS**

7.1 General

- Provide all scaffolding, ladders, or staging equipment, etc. as necessary to accomplish the work of this contract. Scaffolding may be of suspension type; or standing type such as metal tube and coupler, tubular welded frame, pole or outrigger type or cantilever type. The type, erection and use of all scaffolding will comply with all applicable OSHA provisions.
- During the erection and/or moving of scaffolding, care will be exercised so that the polyethylene floor covering is not damaged.
- The rungs of all metal ladders, etc., will be equipped with an abrasive nonslip surface. c.
- All surfaces subject to foot traffic will have a nonskid surface. Surfaces will be cleaned as required to remove slippery materials.
- At the completion of the removal work, all construction aids will be cleaned within the work area and wrapped in one (2) layer of six (6) mil. polyethylene sheet and sealed before removal from the work area.

8.0 **ELECTRICAL COMPONENTS**

- 8.1 Electrical components will be approved by the National Electrical Manufacturers Association (N.E.M.A.) and Underwriter's Laboratories (UL).
- Each unit will be equipped with overload protection, sized specially for the equipment. The 8.2 motor, fan, fan housing, and cabinet will be grounded.

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9.0 PROTECTION OF WORKERS AND SITE VISITORS

Respirators, disposable coveralls, head covers and footwear covers will be provided by PAL Environmental Corp. for the Owner/Owner's Representative, Project Manager and other authorized representatives who may inspect the job site. Provide two (2) respirators and six (6) complete coveralls and, where applicable, six (6) respirator, filter changes per day. Sufficient HEPA cartridges for both half-face air-purifying and powered air-purifying respirators, will be provided for the workers to change during the work shift. No HEPA cartridges will be used longer than three (3) work shifts (work shifts denote eight (8) hours). The respirators will be worn at all times when in the contaminated area. THERE WILL BE NO EXCEPTIONS.

- 9.1 In accordance with NIOSH, OSHA, and ANSI regulations, PAL Environmental Corp. will have a formal respirator-use program that will, at a minimum, consist of the following:
 - a. Establish written standard operating procedures governing the selection and use of respirators.
 - b. Select respirators on the basis of the hazards to which the worker is exposed.
 - c. Instruct and train the user in the proper use of respirators and their limitations. Where practical, assign respirators to individual workers for their individual use. These will be specifically fit tested.
 - d. Regularly clean and disinfect respirators.
 - e. Store respirators and filters in a convenient, clean and sanitary location.
 - f. Maintain and inspect respirators.
 - g. Maintain appropriate surveillance (monitoring) of work area and degree of employee exposure of stress.
 - h. There will be a regular inspection and evaluation procedure to determine the continued effectiveness of the program.
 - i. Do not assign workers to tasks requiring use of respirators unless it has been determined they are physically able to perform the work and use the equipment.
- 9.2 PAL Environmental Corp. will guarantee that all employees have participated and are currently participating in this respirator use program.
- 9.3 PAL Environmental Corp. will provide full body protective clothing (See Section 8.0) to workers and visitors, which will be worn at all times when in the contaminated area.
- 9.4 Protective clothing will be disposed of when leaving the contaminated area and a new set used upon return.

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10.0 **EMERGENCY PRECAUTION**

PAL Environmental Corp. will prepare a contingency plan for emergencies including fire, accident, power failure, negative air system failure, supplied air system failure, or any other event that may require modification or abridgment of decontamination or work area isolation. Note that nothing in this specification should impede safe exiting or providing of adequate medical attention in the event of an emergency.

- 10.1PAL Environmental Corp. will provide barricades and adequate protection to safely prevent passage of persons to the area of removal. Must prevent accidental entrance to the abatement area by any building occupants.
- 10.2Before PAL Environmental Corp. starts actual abatement of asbestos material, the local fire department and ambulance crews will be notified as to the dangers of entering the work area. PAL Environmental Corp. will make every effort to help these agencies and form plans of action should their personnel need to enter the contaminated area.
- 10.3Local medical emergency personnel, both ambulance crews and hospital emergency room staff, will be notified as to the possibility of having to handle injured work persons who are contaminated with asbestos dust. They will be advised on safe decontamination procedures.
- 10.4 First aid will comply with the governing regulations and all recognized recommendations within the industry.
- 10.5General: Except as otherwise indicated, submit special reports directly to Owner within one (1) day of occurrence requiring special report, with copy to Owner's Representative, Project Manager and others affected by occurrence.
 - a. Reporting unusual Events: When an event of unusual and significant nature occurs at site (examples: failure of negative pressure system, rupture of temporary enclosures), prepare and submit a special report listing chain of events, persons participating, response by Contractor's personnel, evaluation of results or effects, and similar pertinent information. When such events are known or predictable in advance, advise the Owner in advance at earliest possible date.
 - b. Reporting Accidents: Prepare and submit reports of significant accidents, at site and anywhere else work is in progress. Record and document data and action; comply with industry standards. For this purpose, a significant accident is defined to include events where personal injury is sustained, or property loss of substance is sustained, or where the event posed a significant threat of loss or personal injury.

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11.0 WORK AREA PREPARATION

11.1 The work area is the location where asbestos abatement work occurs. This is an abatement on non-friable transite siding which will be abated in accordance with Federal and New Jersey State abatement for non-friable siding as outlined in Appendix A.

- 11.2 Should the area beyond the work area(s) become contaminated with asbestos-containing dust or debris as a consequence of the work, clean those areas. Contractor shall perform all such required cleaning or decontamination at no additional cost to the Owner.
- 11.3 Place all tools, scaffolding, staging, etc. necessary for the work in the area to be isolated prior to erection of the plastic sheeting and temporary enclosure.
- 11.4 Employees of PAL Environmental Corp. permitted pursuant to N.J.A.C. 8:60 and N.J.A.C. 12:120 or persons employed by the owner, who have successfully completed maintenance / custodial / worker training course approved by the New Jersey Department of Health, unless the room and objects within it are shown to be uncontaminated by asbestos in which case other employees of the building owner or Contractor may be used, will clean with wet cloths and / or with HEPA vacuums as appropriate. All items that can be removed from the work area without disrupting the asbestos material. This will include furniture, equipment, drapes, and curtains. The cloths used for cleaning will be disposed of as asbestos contaminated waste.

Clean and remove all uncontaminated removable merchandise, equipment, and/or supplies from the work area before commencing work or completely cover with two (2) layers of polyethylene sheeting at least six (6) mil. in thickness securely adhered to in place with tape. Such merchandise and equipment will be considered outside the work area unless the covering plastic or the seal is breached.

- 11.5 Provide warning signs at each visual and physical barrier (see Section 8.0).
- 11.6 Alternate methods of containing the work area may be submitted to the Contracting Officer or his representative for approval. Do not proceed with any such method(s) without prior written approval of the Owner's Representative and Project Managers.
- 11.7 Before proceeding beyond this point in providing temporary enclosures:
- 11.8 Primary Seal/Critical Barriers
- a. Individually seal all ventilation openings (supply and exhaust), lighting fixtures, doorways, windows, skylights, convectors and floor drains, and other openings into the work area with polyethylene sheeting at least six (6) mil. in thickness taped securely in place. Maintain the seal until all work, including project decontamination, is completed. Take care in sealing off lighting fixtures to avoid melting or burning of sheeting.
- b. Mechanically support sheet plastic independently of tape or spray cement seals so that seals do not support the weight of the plastic. Following are acceptable methods of supporting sheet plastic barriers. Alternative support methods may be used if approved in writing by the Contracting Officer or his representative.

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1. Plywood squares 6" x 6" x 3/8" held in place with one 6d smooth masonry nail or electra galvanized common nail driven through the center of the plywood and tape on plastic so that plywood clamps plastic to the wall. Locate plywood squares at each end comer at maximum four (4) feet on centers.

- Nylon or polypropylene rope minimum one-quarter (1/4) inch in diameter suspended between supports securely fastened on either side of opening at maximum one (1) foot below the ceiling. Tighten rope so that it has two (2) inches maximum dip. Drape plastic over rope from outside work area so that a two (2) foot flap of plastic extends over rope into work area. Staple or wire plastic to itself one (1) inch below rope at maximum six (6) inches on centers to form a sheath over rope. Lift flap and seal to ceiling with duct tape or spray cement. Seal loop at bottom of flap with duct tape. Erect entire assembly so that it hangs vertically without "shelf upon which debris could collect.
- 11.9 Remove or properly seal with two (2) layers of six (6) mil. fire-rated polyethylene all electrical and mechanical items such as lighting fixtures, clocks, diffusers, registers, electric panels, escutcheon plates, etc. which cover any part of the surface to be worked on with the work.

At any point should the enclosure barrier be breached in any manner that could allow the passage of asbestos debris or airborne fibers, then the affected area will be added to the work area and be subjected to enclosure as required by this Section of the specification and decontamination as described in Section 16.0.

12/11/06

12.0 WET REMOVAL OF ASBESTOS-CONTAINING AND ASBESTOS-CONTAMINATED MATERIALS

- a. This section outlines the procedures, which are to be used in the wet removal of all asbestos containing and asbestos-contaminated materials as indicated on the Contract Drawings.
- b. Any changes to this procedure will be in writing from the Environmental Project Manager.
- c. PAL Environmental Corp. will certify that all asbestos containing and asbestos-contaminated materials have been removed from the work area.
- d. Prior to and during actual abatement work, mist with amended water all asbestos containing and asbestos-contaminated materials. This will aid in minimizing fiber release during work activities.
- e. The asbestos-containing and asbestos-contaminated materials will be sufficiently saturated to prevent emission of airborne fibers. The amended water or removal encapsulant will be sprayed for as long and as often (before, during, and after removal) as necessary in order to ensure that the asbestos material is adequately wetted throughout.
- f. A fine, low-pressure spray of amended water or removal encapsulant will be applied to prevent fiber disturbances preceding removal. The use of high revolutions per minute (R.P.M.) power equipment, pressure washers, or hydro-blasters is not acceptable. The additive will be the manufacturers.
- g. Asbestos-containing material will be manually removed by scraping or cutting the saturated material from the base material. (Caution will be taken not to damage the base material.)
 - 1. Removal of the asbestos material will be done in small sections by two-person (2) teams, on staging platforms if needed.
 - 2. The wet material from each section will be packed and sealed into labeled six (6) mil. plastic bags.
 - 3. When possible, one (1) worker will remove and hand sections of asbestos material to the other worker who will then place the material into labeled six (6) mil. plastic bags.
- h. In all cases, the asbestos-containing materials will be handled carefully and deliberately. No asbestos is permitted to drop directly to the floor. Any unnecessary agitation of the material is strictly prohibited.
 - 1. Asbestos-containing and asbestos-contaminated materials will not be dropped or thrown to the floor from a height of fifteen (15) feet or greater.
 - 2. This includes inclined chutes and/or dropped onto scaffolding, or containerized at that height for eventual disposal. Asbestos-containing materials will not be dropped or thrown to the floor from fifteen (15) feet or greater.

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i. Operations will be continuous so that once an area is started it will be worked on to the first wet wipe. The wet material from each section will be packed and sealed into labeled six (6) mil. plastic bags and double bagged with visible labels prior to starting the next section. Water-soaked fallen material will be picked up while wet to prevent water loss due to evaporation.

- 1. Maintain good housekeeping so as not to accumulate loose asbestos.
- 2. Reach the clean wipe state as quickly as possible.
- 3. Remove the residues as quickly as possible so as not to walk or track through it, thus grinding it to smaller, more potentially dangerous sizes.
- 4. Trap the asbestos in six (6) mil. plastic bags as quickly as possible so as not to allow asbestos to dry out and become airborne. Bags will be handed or chuted down carefully from one worker to another.
- 5. Contaminated material containing sharp edged items will be cut to size while adequately wet, placed in small cardboard boxes and double bagged, or singly bagged and then placed in temporary fiber drums. 40 C.F.R. 0) prescribes a leak-tight container, the integrity of which is PAL Environmental Corp.'s responsibility (N.J.A.C. 5:23-8.10f5).
- 6. Bags and drums will be marked with the label prescribed by Section 61.22(c) of the E.P.A. regulations. The outside of all containers will be wet cleaned or HEPA vacuumed before leaving the work area (see Section 19.0).
- 7. If at any time the airborne fiber level outside the isolated work area or the clean room of the decontamination unit rises above 0.01 f/cc (action level), the work will stop immediately and air cleaning equipment and clean up procedures will be used to reduce fiber level to less than 0.01 f/cc.
- 8. If at any time the airborne fiber level inside the isolated work area exceeds 0.2 f/cc (action level), the work will stop immediately and air cleaning, wetting, and surface cleaning procedures will be necessary.

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13.0 **CLEANUP PROCEDURES**

- 13.1 The Industrial Hygiene Technician will perform a visual inspection of the work area to ensure that it is dust free.
- 13.2 After approval by the Industrial Hygiene Technician, PAL Environmental Corp. will spray coat all dried exposed surfaces with a sealant. The surfaces to be coated will include the polyethylene which has been used to cover walls, floors and non-removable fixtures and equipment.
- 13.3 After the encapsulation of the polyethylene, it will be carefully removed and rolled up with the contaminated portion.
- 13.4 All equipment, machinery, scaffolding, tools, etc., within the work area will be cleaned with amended water, moved to the equipment room and properly removed from the work area.

13.5 Final Cleaning

- a. Wet clean, with amended water, all floors, windows, etc.
- b. Allow for all surfaces to dry and repeat the procedures.
- c. Used cloths and sponges will be disposed of as contaminated.

Re-occupancy Sampling 13.6

- a. After the work area is found to be visually clean by the Asbestos Technician he/she will perform re-occupancy sampling.
- b. If the PCM standard of <0.01f/cc or the TEM standard of (<70 S/MM2) is not met,
 - 1) Repeat final cleaning and continue decontamination procedures from that point.
- c. If the release criteria is met, PAL Environmental Corp. will
 - 1) Remove the critical barriers separating the work area from the rest of the building,
 - 2) Clean with amended water all covering and areas where the barrier was attached and
 - 3) Shut down and remove the Air Filtration System.

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14.0 Post-Removal Sampling

- 1. After the work area is found to be visually clean by the Industrial Hygiene Technician, he/she will perform post-removal sampling. This test is required to establish safe conditions for removal of critical barriers and to permit reconstruction activity to begin. Sufficient time following clean-up activities will be allowed so that all surfaces are dry during monitoring. Negative air filtration units will be in use during monitoring.
- 2. If the PCM standard of <0.01 f/cc or the TEM standard of (<70 structures per square millimeter, Transmission Electron) is not met, repeat final cleaning and continue decontamination procedures from that point.
- 4. If the release criteria are met, PAL Environmental Corp. will remove the critical barriers separating the work area from the rest of the building. Clean with amended water all areas where the barrier was attached and covering and shut down and remove the air filtration system.

12/11/06

15.0 DISPOSAL OF ASBESTOS-CONTAINING WASTE

15.1 All wastes generated within the isolated work area, including but not limited to, asbestos, materials, plastic sheeting, tape, cleaning materials, protective clothing, all filers, brushes, pails, brooms and all other disposable material or items used in the work area will be packed, sealed and disposed of according to this section.

- 15.2 PAL Environmental Corp. will not allow asbestos materials to dry out or collect on the floors. Removed material will be immediately placed in approved bags (we Section 8.0) and sealed.
- 15.3 The material collected in each bag is to be sealed by twisting the open end and then tying an overhand knot in the twisted material (or other approved method, which will form a leak-tight seal). The bag is then placed in another bag, which is also sealed for transport to the disposal site. Broken bags will be rebagged a third time.
- 15.4 Warning labels, having waterproof print and permanent, waterproof adhesive, will be affixed to all bags, dumpsters, trucks and other containers used for asbestos. Labels will be conspicuous and legible and will contain the following warning (as a minimum):

CAUTION
DO NOT OPEN
AVOID CREATING DUST
CANCER AND LUNG DISEASE
HAZARD

- 15.5 The dumpster will be completely enclosed and locked. It is to be opened only for materials from the removal area. Warning signs will be posted on the dumpster.
 - PAL Environmental Corp. will maintain a bag disposal log numbering each bag of waste with an indelible black ink pen. Copies of this log will be submitted to the Owner for final payment.
- 15.6 PAL Environmental Corp. will transport all sealed bags to an approved sanitary landfill disposal site. Disposal will be in accordance with the Environmental Protection Agency and New Jersey Department of Environmental Protection.
- 15.7 PAL Environmental Corp. will be responsible for obtaining approval of an asbestos waste disposal site in compliance with Section 61.25 of the E.P.A. regulations and all other Federal, State and Local regulations. All transportation will be performed by a registered waste hauler. PAL Environmental Corp. will arrange with the transporter to obtain copies of receipts from the disposal site, indicating that the asbestos waste was disposed. PAL Environmental Corp., in turn, will forward copies of such receipts to the Owner/Owner's Representative.

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16.0 QUALITY ASSURANCE AIR MONITORING

Air monitoring on this project will be conducted by the Industrial Hygiene Technician to 16.1 furnish testing and reports of test results.

- 16.2 The Abatement Contractor will fully cooperate with the Industrial Hygiene Technician, and all others responsible for testing and inspecting the worksite.
- 16.3 Air monitoring will be conducted prior to the abatement procedures, daily throughout the asbestos abatement project and during the initial phases of clean up by the Industrial Hygiene Technician in order to verify the quality and effectiveness of the job being done.
- 16.4 It is the responsibility of the Abatement Contractor and PAL Environmental Corp.'s personnel to cooperate fully with the efforts of the Industrial Hygiene Technician at all times and ensure the ease of access to and from the work area for the effective completion of the monitoring program.
- 16.5 Please be advised that tampering with any equipment involved with these tests or inspections will be considered an attempt at falsifying reports and records to Federal and State agencies, and each offense will be prosecuted under applicable State and Federal laws to the fullest extent possible.

These area samples will be collected during the removal phase:

Area Sampling of Work Area

For the purpose of determining if fibers are escaping into adjacent areas The sampling device will be placed inside and outside locations where potential contamination could occur and will be moved periodically to assess the contamination potential of adjacent areas at critical points as determined by the Industrial Hygiene Technician. If fiber levels exceed .0.01 f/cc, the Industrial Hygiene Technician has the authority to stop work and have the problem corrected.

2. Post-Removal Sampling.

The purpose of this test is to establish the release criteria when analyzing by Polarized Contrast Microscopy (PCM). The release criteria will be five PCM samples all having a reading of <0.01 f/cc. If Transmission Electron Microscopy (TEM) is necessary, then the release criteria will be <70 s/mm2 by the average concentration of asbestos of five (5) air samples collected within the affected functional space. The Transmission Electron Microscopy (TEM) Method in Appendix A of Subpart E of 40 CFR, Part 763 -"Asbestos-Containing Materials in Schools" will be followed.

2.1 Filter cassettes and sampling train will be assembled as specified in NIOSH #7400. The flow rate will be between 1 and 10 liters per minutes The total volume will be a volume sufficient to achieve a detection limit of < 70 structures per square millimeter. Pumps will be calibrated before and after sampling and record dept of this calibration.

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2.2 Blanks. A minimum of two (2) blanks or 10%, whichever is greater, will be taken. Blanks will be divided by the work shift. One (1) or more blanks will be taken with the first round of samples and one (1) or more blanks will be taken with the second round of samples.

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1

17.0 PAL WORK PLAN



PAL ENVIRONMENTAL SAFETY CORP.

Environmental Contracting Specialists

Work Plan

Cornell-Dubilier Electronics Superfund Site-OU2
338 Hamilton Blvd
South Plainfield, NJ

December 11, 2006 Revision A

A. Removal of Asbestos Containing Pipe Insulation

Asbestos Abatement Tent Procedures:

- 1. A remote decontamination unit will be constructed at least 20 feet from the work area.
- 2. A six sided tent enclosure with a change room will be erected around the asbestos containing pipe insulation.
- 3. A negative pressure air filtration device will be installed and operated throughout the removal procedures.
- 4. Asbestos materials will be thoroughly wetted prior to and during removal.
- 5. Asbestos waste will be double-bagged in 6 mil thick bags, labeled and processed through the remote decontamination facility and properly disposed of.
- 6. After abatement has been completed all surface within tent enclosure will be HEPA vacuumed and wet cleaned.
- 7. After the work area has passed a visual inspection, the entire work shall be encapsulated.
- 8. Tents will be broken down upon approval by the environmental consultant assigned to the project
- 9. ACM waste will be picked up by a licensed waste hauler. Waste trucks leaving the site will proceed to licensed waste transfer station where the waste will be processed for transport and disposal at the licensed designated landfill. The amount of waste will be recorded for tracking purposes and the waste manifests shall be provided and coordinated with the USACE Contracting Officer Representative by Sevenson.

All abatement work will be performed in conformance with the Sevenson Site Safety and Health Plan, the Asbestos Work Plan Specifications (013280A), along with the PAL's Corporate Health and Safety requirements as submitted under Appendix A.

Approved by:

Liam Horgan AIHA CIH 12/11/2005 12:26 2127850234

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PAL ENVIRONMENTAL SAFETY CORP. Gnuironmental Contracting Specialists

Work Plan

Comeli-Dubiller Electronics Superfund Site-OU2
338 Hamilton Bivd
South Plainfield, NJ

December 11, 2006 Revision A

A. Removal of Asbestos Containing Pipe Insulation

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- After abatement has been completed all surface within tent enclosure will be HEPA vacuumed and wet cleaned.
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All abstement work will be performed in conformance with the Sevenson Site Safety and Health Plan, the Asbestos Work Plan Specifications (013280A), along with the PAL's Corporate Health and Safety requirements as submitted under Appendix A.

Approved by:

Liam Horgan (

AIHA CIH

S329 CP

EXP.RES
6-1-2006

11-02 QUEENS PLAZA SOUTH, LONG ISLAND CITY, NEW YORK 15101 TEL (718) 349-0900 FAX (718) 349-2800

12/11/06

Revision:

<u> 10</u>

Appendix A

PAL Environmental Corp., Inc. November 28, 2006

Appendix B Assessment Resources & Technologies Third Party and CIH

Liam O. Horgan, CIH Industrial Hygienist/Environmental Engineer

BACKGROUND

Mr. Horgan is a Certified Industrial Hygienist with seventeen years experience in the industrial hygiene and environmental engineering fields. He has been responsible for the development, implementation and management of a wide variety of projects with emphasis in the hazardous materials field. Mr. Horgan has been involved in the management of investigations and remediations of over 200 hazardous waste sites with responsibilities ranging from project safety officer to project manager.

WORK EXPERIENCE

12/89 to Present

Assessment Resources & Technologies, inc.

N.Y.C., N.Y.

Technical Director

4/87 to 12/89

Phoenix Safety Associates, Ltd.

Valley Forge, Pa.

Technical Director/Project Manager

9/83 to 4/87

Ebasco Environmental Services, Inc.

Lyndhurst, NJ

Health & Safety Officer/Project Manager

6/82 to 9/83

Nuclear Utility Services, Inc.

Gaithersburg, MD.

Air Chemist/Preliminary Assessment Group Leader

9/78 to 6/82

New Jersey Institute of Technology.

Newark, NJ

Research Assistant Air Pollution Research Laboratories

EDUCATION

9/74 to 6/76

University of the City of New York, New York, NY

Civil & Environmental Engineering

9/76 to 6/78

New Jersey Institute of Technology, Newark, NJ

Bachelor of Science Environmental Engineering

9/78 to 6/82

New Jersey Institute of Technology, Newark, NJ

Master of Science Environmental Engineering

CERTIFICATIONS

Mr. Horgan has certifications in the following areas:

American Board of Comprehensive Practice of Industrial Hygiene. Industrial Hygiene (CIH #5329)

Board of Certified Candidate for certification in

Safety Professional Comprehensive Practice (October, 1996)

OSHA 29CFR 1910 Health & Safety for Hazardous Waste Sites Operations

Hazardous Waste Site; Worker & Supervisor

AHERA Asbestos Inspector/O&M Planner/Project Designer

NYC/NYS Asbestos Investigator/Management Planner/

Project Designer & Monitor

EPA/HUD Lead Investigator/Contractor/ Risk Assessor

KEY PROJECTS

Site Investigations

PCB Survey.

While working for the EPA Region II FIT contractor, Mr. Horgan was the Preliminary Assessment Group Leader for sixty nine waste sites. In this capacity, he was responsible for the collection of information used to rank the site by the Myder Model for ranking on the National Priorities List. Mr Horgan was responsible for the development of the building survey procedures use in the assessment of the South Plants at Rocky Mountain Arsenal. In addition, he has performed numerous Phase I assessments for property transfers.

Site Operations & Management

Mr. Horgan has a strong background in the daily operations and management of various environmental projects. Typical experiences include:

Project Management for asbestos abatement at Madison Square Garden and several health care facilities for the District of Columbia.

Project Design and Development for the Building Demolition of the Cosden Chemical Coating Superfund Site. In this capacity, Mr. Horgan was responsible for the development of Health & Safety Plans, Bracing & Shoring Plans, Asbestos Abatement Plans, PCB Removal Plans, Metal Contaminated Building Demolition Plans, Environmental Protection Plans, Soil Erosion Protection Plans, Waste Transportation and Disposal Plans. Project design and management for the assessment of hazardous waste site emissions impact on ambient air quality at twelve Superfund Sites in EPA Region I & II. Field Team Leader for the Newark Dioxin Survey, the Montclair Radon Survey, and the Wide Beach

Health & Safety Responsibilities

Mr. Horgan's expertise in analytical chemistry has kept him deeply involved in the Health & Safety aspects of site investigations.

Typical projects include;

Responsible for the development and implementation of the health and safety plan for numerous site investigations and remidiations, including Rocky Mountain Arsenal and Burnt Fly Bog.

Responsible for the independent evaluation of health & safety during the remedial action at Laquana Landfill and OSHA compliance surveys at numerous sites, including the New York City Transit Authority.

Construction Safety

Mr. Horgan's experience with hazardous waste site operations has necessarily included various aspects of construction safety.

Typical experience include;

Site Safety Audits of New York City Transit Authority shops.

Health and Safety Coordinator for all aspects of 29 CFR 1910 & 1926 for the installation of a methane venting system and a leachate collection and treatment system at the Freshkills Landfill.

Industrial Hygiene

Mr. Horgan has extensive industrial hygiene experience, which ranges form traditional concerns to the more esoteric concerns at hazardous waste sites.

Typical experience include;

OSHA Compliance Audits of Port Authority of New York & New Jersey -JFK Airport facility and American International Group facilities.

Analytical Experience

Mr. Horgan's extensive analytical expertise has enabled him to design and implement novel field analytical methods for the environmental and occupational assessments of numerous Superfund sites.

Typical projects include;

Field screening and analytical methods for the assessment of personnel exposure at hazardous waste site. By quantitatively and quantitatively analyzing personnel samples in the field, personnel protection was greatly increased without the losses in productivity usually encountered when limited to survey instruments.

Assessment of Phase II Environmental Site Assessments for property transfers. Laboratory Director and Quality Assurance Officer for several NYC based asbestos analytical laboratories.

Liam O. Horgan (cont'd)

Training Experience

While working for Ebasco Environmental Services, Mr. Horgan was responsible for the development and implementation of a training program to meet the requirements of 29 CFR 1910.120. In this and subsequent positions, he has been responsible for the initial and refresher training of over 2000 hazardous waste site workers. In addition, Mr. Horgan is an instructor at New York University, School of Continuing Education and has been involved in training programs for asbestos, lead, confined spaces, environmental investigators, indoor air quality, and worker right to know. Mr. Horgan serves as an instructor for many OSHA required training programs. As part of his continuing education, Mr. Horgan has successfully completed two train the trainer courses.

PUBLICATIONS AND PRESENTATIONS

Journal of the Air Pollution Control Association, April 1983, Vol.33 No.4: Concentrations of Selected Vapor and Particulate Phase Substances in the Lincoln and Holland Tunnels.

American Institute of Chemical Engineers, 1984 Annual Meeting: Determination of Organic Vapor Emissions from Hazardous Waste Sites

American Industrial Hygiene Association, 1990 Annual Meeting: Evaluation of a Programed Thermal Desorber for the Analysis of Personnel Air Samples During the Remedial Investigation at a New York City Landfill

Building Owner Management Institute 1996 BOMI Regulatory Compliance Manual Technical reviewer for; Indoor Air Quality/Air Emissions/SARA Title III

PROFESSIONAL AFFILIATIONS

American Industrial Hygiene Association, American Board of Industrial Hygiene New York Metro Industrial Hygiene Chapter World Safety Organization American Society of Safety Engineers National Fire Protection Association

AMERICAN BOARD OF INDUSTRIAL HYGIENE®

6015 West St. Joseph • Suite 102 • Lansing, Michigan 48917-3980 • (517) 321-2638

ABIH ®



February 5, 1998

L Kenneth Conover, Cii

Vice-Chair Daniel E. Agopsonicz, Cih

Exxon Chemical Company

RÓY J. COVERT, CIH Covert & Associates

CHRISTOPHER WERNICKO, CIH Hamilton Standard

Virectors

EDWARD I BARTOSH, JR., CIH

HARRY J. BEAULIEU, PhD., CHI Industrial Hygiene Resources

CHING-TSEN BIEN, CIH LAO Consulting, Inc.

MARY BROPHY, Ph.D., CH New York State Department of Labor

MiCHEL J. CREPEAU, CIH Digital Equipment Corporation

> ALICE FARRAR, CIH Clayton Environmental Consultants, Inc.

THEODORE A. FELTON, CIH General Electric Company

ELIZABETH R. GROSS, CIH Dana-Farber Cancer Institute

DON W. HARVEY, CIH U.S. Department of Energy

THOMAS A. HETHMON, CIH Phelps Dodge Corporation

JOSEPH A. JAKUBOWSKI, CH Pharmacia & Upjohn, Inc.

KIRBY P. JAMES, CIH North York Board of Education

ROSEMARY E. PATNODE, CIH U.S. Department of Veterans Affairs

> ANA M. PRIETO, JO, CIH Novartis Corporation

Liam O. Horgan, CIH 310 East 71 Street New York, NY 10021

(212) 472-9075

Dear Mr. Horgan,

I am pleased to inform you that your Certification Maintenance Worksheet has been reviewed by the Board and your professional activities for 1992-1997 have been found to fulfill the Board's requirements. Your new CM cycle runs for five calendar years from January 1, 1998 to December 31, 2002. Your next recertification worksheet must be submitted no later than February 1, 2003.

Enclosed you will find your CM sticker which attests to your continued certification. You should place this sticker on your certificate. Please note that the expiration date is December 31st of your 6th year. This is to allow time for submission, review, possible audit and approval of your next worksheet. You may wish to begin to record your points for the next five year cycle and can do so on the enclosed CM Worksheet.

You will also be receiving an embossing seal within 6-8 weeks which gives your name, certification number and CM expiration date. The Board hopes that your use of this embossing seal will contribute to the promotion of industrial hygiene.

The Board appreciates your continued professional service and your support of the Certification Maintenance Program.

In the meantime, please remember that it is your responsibility to inform us of any address changes and keep current with your annual dues.

Very truly yours,

Roy J. Covert, CIH Secretary, ABIH

F:WP\CMOKAY97

Executive Director LYNN C. O'DONNELL, CIH The

American Board of Industrial Hygiene ABIH



organized to improve the practice of Industrial Hygiene proclaims that

Liam O. Horgan

having met all requirements through education, experience, and examination, is hereby certified in the

COMPREHENSIVE PRACTICE of INDUSTRIAL HYGIENE

and has the right to use the designations

CERTIFIED INDUSTRIAL HYGIENIST

CIH

December 9, 1991

Kenneth M. Walking for Chairman ABIH

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certificate number Morely Herre

AMERICAN BOARD OF INDUSTRIAL HYGIENE®

ABIH :

6015 West St. Joseph • Suite 102 • Lansing, Michigan 48917 • (517) 321-2638 (517) 321-4624 Fax www.abih.org • e-mail:abih@abih.org



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ROYEMARY BIRAIN COS. OIN, COR. U.S. Department of Jederans Affairs.

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> PHILIPS STERN Colorado Project "Plino

BONNIE E. WEEKS, CIH Wetesley College

Executive Director
Liften C Obchalett, CIH

February 25, 2003

Liam O. Horgan, CIH 310 East 71st Street, #2D New York, NY 10021

Dear Mr. Horgan,

I am pleased to inform you that your Certification Maintenance Worksheet has been reviewed by the Board and your professional activities have been found to fulfill the Board's requirements. Your new CM cycle runs for five calendar years from January 1, 2003 to December 31, 2007. Your next re-certification worksheet must be submitted no later than February 1, 2008. Diplomates submitting a CM Worksheet postmarked after the February 1 deadline will be required to pay a \$100,00 late fee.

Enclosed you will find your CM sticker which attests to your continued certification. You should place this sticker on your certificate. Please note that the expiration date is June 1st of your 6th year. This is to allow time for submission, review, possible audit and approval of your next worksheet. You may wish to begin to record your points for the next five year cycle and can do so on the enclosed CM Worksheet.

The Board appreciates your continued professional service and your support of the Certification Maintenance Program. Certification maintenance changes will be reported in the ABHI Newsletter and at the ABHI web site (abih.org).

In the meantime, please remember that it is your responsibility to inform us of any address changes and keep current with your annual renewal fee.

Very truly yours.

Kirby P. James, CHI, ROH Secretary, ABIH

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Accreated by the Council of



Asbestos Analysts Registry

QUALITY COUNTS

AAT Performance Results Report

2700 Prosperity Ave., Suite 250, Fairfax, VA 22031 • Phone: (703) 849-8888 • Fax: (703) 207-3561

Paul Ottens Assessment Resource & Technologies, Inc. 111 John Street, Suite 538 New York, NY 10038 7/13/2006 Laboratory ID: 100228

REPORT OF PERFORMANCE FOR ROUND # 78, ORGANIZATION # 100228

The following individuals have met all the requirements* for listing in the Asbestos Analysts Registry (AAR) and have been approved by the AlHA Analytical Accreditation Board (AAB):

			Manager Company of the Company of th								Outliers		
ID	Name		RESULTS (f/mm2) FOR THE CURRENT ROUND (R78) R78 R77							TOT	Performance		
1608	Ottens, Paul	A781	0341	B781	0446	C781	0427	D781	0518	0	0	0	Acceptable
7894	Wismer, Joseph	A781	0355	B781	0422	C781	0438	D781	0509	0	0	0	Acceptable

The following individuals have applied for listing in the AAR and are in the process of gaining AIHA AAB approval status, but have not met all the criteria*:

			•	Outliers	' '	
ID	Name	RESULTS (f/mm2) FOR THE CURREN	T ROUND (R78)	R78 R77 TOT	Performance	

The determination of outliers for the above results is based on the following performance limits:

Reference Values for Round #78

					***************************************	***************************************	·	 		·	,
Sample ID:	A781	B781	C781	D781	ļ				ļ		
Lower Limit:	141	167	170	196							
Ref Value:	283	335	341	393							
Upper Limit:	566	670	682	786							

*Criteria for AIHA Analytical Accreditation Board Approval:

- 1. An organization has to be reviewed and approved by AAR Reviewers and has to meet all the requirements of the most current AAR Policies and NIOSH 7400 method.
- 2. An analyst has to have completed two (2) consecutive AAT rounds with no greater than 2 outliers combined.
- 3. After the round in which an analyst gains proficiency, the analyst will go on ballot for AAB approval. Board approval letters will be sent to the analyst approximately 2 weeks after the results for the round are posted / mailed. Board approval is not granted until after the ballot is closed and approved.

Notes:

- 1. It is the organization's responsibility to thoroughly review results and to immediately contact AIHA in writing to request removal from the Asbestos Analyst Registry for any analyst who is no longer a member of their organization.
- 2. Unacceptable performance may be improved by correctly analyzing a set of RETEST samples. RETEST Sample Forms are provided in each shipment of AAT samples. You may also contact AIHA at 703-849-8888.
- 3. If an analyst is unable to participate, he/she must request from AIHA an "Excused Absence" from the AAT round prior to the closing of the round. Please note that an "Excused Absence" will not be granted for consecutive rounds.

Legend:

- '--" denotes that the analyst did not submit any data (resulting in 4 outliers).
- "~" denotes that a sample ID or sample result was not within acceptable range.
- "X" denotes that the analyst was not enrolled in the specified round at the time of testing.
- "E" denotes an approved excused absence.

NEW YORK STATE DEPARTMENT OF HEALTH WADSWORTH CENTER

Antonia C. Novello, M.D., M.P.H., Dr.P.H.



Expires 12:01 AM April 01, 2007 Issued April 01, 2006 Revised May 22, 2006

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. PAUL OTTENS ASSESSMENT RESOURCES & TECHNOLOGIES 111 JOHN STREET #538 NEW YORK, NY 10038 NY Lab Id No: 11004 EPA Lab Code: NY01393

is hereby APPROVED as an Environmental Laboratory for the category ENVIRONMENTAL ANALYSES AIR AND EMISSIONS All approved subcategories and/or analytes are listed below:

Miscellaneous Air

Fibers

NIOSH 7400 A RULES

al No.: 30253

F / of the New York State Department of Health. Valid only at the address shown. Must be co...,..cuously posted. Valid certificates have a raised seal. Continued accreditation depends on successful ongoing participation in the Program. Consumers are urged to call (518) 485-5570 to verify laboratory's accreditation status.

NI Department of Community Affairs
Division of Codes and Standards
Bureau of Code Services

This is to certify that

Joseph Wiemer

has been contified as.

different Safety Technician
Certification V 91027

Effective Date 02/01/05
Expansion Date 01/31/07

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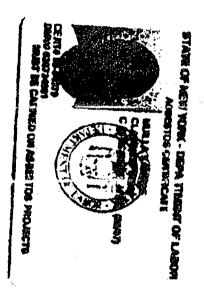
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STATE OF NEW JERSEY DEPARTMENT OF LABOR & WORKFORCE DEVELOPMENT ASBESTOS CONTROL AND LICENSING

ROLLAND BARNHART 21 Perrine Avenue

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06/21/2006 ISSUE DATE

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